FEDERAL GOVERNMENT OF SOMALIA

Ministry of Finance (MoF)

PROJECT: Somalia Crisis Recovery Project (SCRP)
PROJECT ID- P173315

Environmental and Social Management Plan (ESMP)

RE-CONSTRUCTION OF HABALA ADEY MATERNAL & CHILD HEALTH (MCH) FACILITY
BARDHERE DISTRICT, JUBALAND STATE

3 March 2022

Project Implementation Unit (PIU)
Ministry of Finance
Federal Government of Somalia

Contents

EXECUTIVE SUMMARY 3

1. INTRODUCTION 4

1.1 Project Background 4
1.2 Purpose of the ESMP 5

2. POLICY AND LEGAL FRAMEWORK 6

2.1. National Regulatory and Policy Framework 6
2.2. International Conventions Signed and Ratified by Somalia 8
2.3. World Bank Environmental and Social Standards (ESS) 10
2.4. Legal Gap Analysis 13

3. BIOPHYSICAL AND SOCIO-ECONOMIC ENVIRONMENT 23

3.1 Proposed Project Location 23
3.2 Physical Environment 24
3.2. Socio-economic Environment 31

4. PROJECT DESCRIPTION 35

4.1 Proposed Facility 35
4.2. Design Standards 40
4.3. Project Activities 40

5. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS 42

6. RISKS/IMPACTS AND MITIGATION MEASURES 44

7. IMPLEMENTATION ARRANGEMENTS 56

7.1 Government Institutions Responsibilities 56
7.2 Contractor 57

8. REPORTING ON ESMP COMPLIANCE 59

9. CAPACITY BUILDING AND TRAINING 60

10. STAKEHOLDER CONSULTATIONS 61

11. GRIEVANCE REDRESS MECHANISMS 65

12. IMPLEMENTATION BUDGET 66

13. CONCLUSIONS 67

REFERENCES 68

LIST OF TABLES

Table 21 : Gap Analysis World Bank ESS and National Legal Framework 16

Table 31: Table 2 Population profile of Gedo region 37
Table 61: Environmental & Social Management Plan: Re-construction of MCH 48
Table 71: Institutional partners responsibilities 59
Table 81: ESMP Monitoring and Compliance Reports 62
Table *101*: Details of the stakeholder consultation 66
Table 121: Implementation Budget 69

LIST OF FIGURES

Figure 31 : Map of Gedo Region showing location of Bardhere District 26
Figure 32: Habala Adey MCH shown in brown circle 27
Figure 33: Geological map of the southern section of Somalia 28
Figure 34: Climate in Bardhere District 29
Figure 35 : Seasonal variations in temperature for a year 30
Figure 36: Rainfall pattern in the course of the year 31
Figure 37: Map of Somalia showing Bardhere affected by riverine floods 33
Figure 38: Habala Adey MCH, the Main blue building in the background, is the current hospital building 36
Figure 39: The current Habala Adey MCH waiting room 37
Figure 41: The proposed design for reconstruction of the MCH 41
Figure 42: The proposed site plan for the reconstruction of MCH 42
Figure 101: *Consultations in Bardhere with Local Government and IDPs* 66

LIST OF ANNEXES

Annex 1: Community Consultations: Stakeholders Consulted 72
Annex 2: Grievance Redress Mechanisms 74
Annex 3: World Bank Environmental and Social Standards (ESS) 80
Annex 4: Environmental and Social Monitoring Template 82
Annex 5: Code of Conduct for Workers 83

LIST OF ACRONYMS AND ABBREVIATIONS

CERC	Contingency Emergency Response Component
CESMP	Contractor-ESMP
CoC	Code of Conduct
CRW	Crisis Response Window
CRW ERA	Crisis Response Window Early Response Allocation
CSO	Civil Society Organization
E&S	Environmental & Social
EHSG	Environmental, Health and Safety Guidelines
EIA	Environmental Impact Assessments
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FAO	Food and Agricultural Organization
FGS	Federal Government of Somalia
FMS	Federal Member State
GBV	Gender-Based Violence
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanisms
IDP	Internally Displaced Person
IP	Implementing Partner
LMP	Labor Management Procedures
MCH	Maternal and Child Health
OHS	Occupational Health and Safety Standards
PAPs	Project Affected Populations
PDO	Project Development Objective
PIU	Project Implementation Unit
PSC	Project Steering Committee
POM	Project Operations Manual
PPE	Personal Protective Equipment
PSEA	Prevention of Sexual Exploitation and Abuse
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SCRP	Somalia Crisis Recovery Project
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Security Management Plan
SPT	State Project Team

SWALIM	Somalia Water and Land Information Management
SWS	South West State
UN	United Nations
UNDP	United Nations Development Programme
UNICEF	United Nations' Children Fund
UNFPA	United Nations Population Fund
WB	The World Bank
WMP	Waste Management Plan

Executive Summary

The proposed Project includes the decommissioning of the current Habala Adey Mother & Child Health Care Facility (MCH) and the re-construction of the existing facility into a modern MCH and its supporting amenities. In consultation with the local health authorities, UNOPS has designed this facility complete with basic amenities such as electricity, water, sanitation, and waste management facility etc. The proposed single-storey building will measure 132 m^2.

The MCH is located towards the southwestern end of Somalia in Bardehere District, Jubaland State. Bardhere town sits on the floodplains of the Jubba River at an altitude ranging from 90m asl to 110m asl. The area is generally flat and sits within the riverine area of Jubba. The proposed single-storey building will measure 230 m^2. Outside and separate from the main building, a proposed block for washrooms with a floor area of 26m^2 has been designed. The current main health care facility building and the pit latrines will be decommissioned.

There are significant positive impacts that are expected from the project. The primary beneficiaries are populations in rural areas, including farmers, agro-pastoralists, pastoralists, and rural IDPs (displaced due to various factors and living among host communities in rural areas) that benefit from the construction of the MCH. The MCH will improve accessibility to health services in town for the rural populations. Negative risks and impacts are mainly associated with construction works and include risks related to occupational health and safety of workers both during the construction and operational phases, increased level of dust, noise and vibration from moving of construction vehicles and machinery, community health and safety risk, risks associated with labor rights and management, e.g. child labor or forced labor, labor influx and associated risks such as GBV/SEAH, and others.

This Environmental and Social Management Plan (ESMP) specifies the means through which the adverse environmental and social risks and impacts of the Project associated with decommissioning, construction and operational activities are either avoided or mitigated. It identifies, characterizes and manages the potential risks and impacts. The ESMP lists the project-specific risks and impacts and mitigation measures, lays out institutional arrangements for implementing and monitoring the risk mitigation measures and proposes monitoring indicators for measurement and monitoring of E&S performance. It shows exactly what must be done, by whom, when, and to what standard; and also shows who will monitor its implementation and when and what the budget implications for both, mitigation measures and monitoring activities are. It further includes a description of the Project Grievance Redress Mechanism (GRM), which needs to be applied during the construction period, and reiterates stakeholder consultations that have been conducted in the lead up to the project design.

1. Introduction

1.1 Project Background

The Federal Government of Somalia (FGS) appealed for emergency assistance and investment in longer-term solutions to avert a future crisis in October 2019, with the government-led response directed by a high-level inter-ministerial Flood Response Committee. This was followed by an appeal by the FGS to the World Bank to support a government-led Post Disaster Needs Assessment and Floods Recovery and Resilience Framework for the flood-affected areas in early December 2019, followed by a further request in January 2020 to the World Bank for funding from the International Development Association (IDA) Crisis Response Window (CRW) to support flood recovery and resilience-building.

The Somalia Crisis Response Project (SCRP) contains the following components:

Component 1 Immediate basic services and livelihood support for early recovery to the flood-affected states of Hirshabelle, South West, and Jubaland and locust-affected areas nationally.

Component 2: Medium-term flood recovery to rehabilitate critical public and community infrastructure in line with build-back-better and climate-resilient standards.

Component 3: Longer-term disaster risk management and preparedness. This component will strengthen the institutional capacity and preparedness of governmental ministries agencies and departments to respond to flood and drought related emergencies.

Component 4: Project Management. This component will strengthen the institutional capacity Project Implementation Unit (PIU) and State Project Teams for the implementation of the Project.

Component 5: Contingency Emergency Response Component. This Contingency Emergency Response Component (CERC) is included in the Project in accordance with Investment Project Financing (IPF) Policy.

Component 6: Anticipatory and Recovery Support for Addressing Food Insecurity. The proposed scope of this new component supported with subsequent additional financing to address food insecurity has two subcomponents consistent with the original objective of the SCRP. They are (a) Anticipatory Action and Early Response Support to Food Insecure Communities, and (b) Medium-term Sustainable Recovery and Resilience of Food Insecure Communities.

The proposed sub-project for the construction of the Habala Adey MCH will be implemented under component 2 - medium-term flood recovery - which supports the rehabilitation of critical

infrastructure in line with build-back smarter standards. It includes rehabilitation of medical health care facilities, which have been affected by floods.

The health sector needs have been vast and vulnerable to recurrent natural and man-made disasters, including fluctuating levels of conflict, poverty, economic crunch, political uncertainties, drought, floods and epidemics. The burden of diseases (BoD) has been heavily dominated by communicable diseases, reproductive health and undernutrition issues whereas issues related to non-communicable diseases are also on the rise. The re-construction of the MCH shall begin to eases the burden the health sector is already experiencing in the city. There will be improved access to medical health care services by the local community.

The project team has undertaken an E&S screening of the sub-project, as per process described in the SCRP ESMF[1]. The screening resulted in placing the sub-project into 'Category C: Moderate Risk', as per the levels defined in the ESMF. It was decided that an ESMP would best guide the risk management for the sub-project.

1.2 Purpose of the ESMP

This ESMP lists the typical environmental and social (E&S) risks and impacts and associated mitigation measures that need to be considered at minimum in the context of re-construction of Habala Adey MCH and decommissioning of the old structure. The purpose of the management plan is to provide a consolidated summary of all the Environmental and Social (E&S)[2] commitments relevant for the construction, commissioning and operational phases of the project, including Occupational Health & Safety (OHS) and waste management. The measures focus on environmental aspects such as air emissions, environmental contamination and social aspects such as communication with local stakeholders and safety of workers and communities. The ESMP lists the project-specific risks and impacts and mitigation measures, lays out the institutional arrangements of the implementation and monitoring of the risk mitigation measures, and proposes monitoring indicators for measurement and monitoring of E&S performance.

The objective of this ESMP is therefore to provide management actions to mitigate negative risks and impacts, in consistence with national framework (and/or regional references) and relevant WB's ESSs & WBG General EHSGs..

[1] SCRP, Environmental and Social Management Framework, amended August 2021.

[2] For the sake of simplicity, the acronym E&S is used throughout this document, but this acronym should be interpreted as including environment, social, occupational health and safety, human rights and labour aspects.

2. Policy and Legal Framework

2.1. National Regulatory and Policy Framework

Somali policy and legislation with respect to the environment is nascent or outdated. A number of international agreements exist, and although binding on Somalia, there has been little progress in the implementation of those. These international environment agreements include topics such as biodiversity, desertification, endangered species, and ozone layer protection.

In recent years the Federal Republic of Somalia and its Federal Member States (FMS) have effected constitutional changes that define natural resources, common environmental goods and ecosystem services as protectable public assets, and ascertain the right to a clean and healthy environment. However, there are no specific environmental or regulations in place. Protection and use of Somali water resources is the responsibility of the Ministry of Water Resources that has put a policy, act and regulatory framework in place. The Min. for Natural Resources (MNR), shall establish the Regional Watch Councils (REWC). The MNR, in consultation with the Local Government Councils/ District Governor, local CSO/CBOs and the community shall establish the District Environment and Environment Watch Council (DEWC).

As a stop gap measure, in the absence of a national regulatory framework for sustainable environment, Somalia has a **Provisional Constitution** (2012) that contains a number of parameters relevant for various operational activities for the planned sub-project of the SCRP: Article 12 addresses public assets and natural resources; Art. 11 provides that all citizens have equal rights regardless of sex, and that the State must not discriminate against any person on the basis of gender; Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose; Art 24. Prohibits sexual abuse in the workplace; Article 24.5 stipulated that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place; Article 25 states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.

Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. Furthermore, all people have a duty to safeguard and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment. The FGS and the governments of the FMS affected by environmental damage shall take urgent measures to clean up hazardous waste dumped on the land or in the waters of the FGS; take necessary measures to reverse desertification, deforestation and environmental degradation, and to conserve the environment and prevent activities that damage the natural resources and the environment of the nation, among other measures.

The Labour Code of 1972[3] stipulates that all contract of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.

In regards to occupational health and safety standards (OHS), the employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.

The Labour Code further stipulates that workers have the right to submit complaints and the employer must give the complaints due consideration. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.

Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night. The Labor Code further forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade union.

The Labor Code stipulates right to equal pay for the same work as men, paid maternity leave. Women are entitled to 14 weeks of maternity leave at half pay.

The **Somali Penal Code of 1962** criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that 'carnal intercourse' and 'acts of lust omitted with violence' are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401.

Somalia National Gender Policy (2016) includes strategies to eradicate harmful traditional practices such as FGM/C and child marriage and to improve services for the management of GBV cases

The National Environmental Policy (2015) promotes the use of appropriate environmental assessment instruments.

[3] The Code has recently been revised, but the revisions have not yet been passed and signed into law.

In regards to the institutional capacity for environmental management, a Directorate of Environment is integrated in the Office of the Prime Minister. It is mandated to draft relevant policies and legislation, including establishing of the Environmental Quality Standards, and Sectoral Environmental Assessments, Environmental Impact Assessments (EIA). Laws on environmental governance in Hirshabelle are at infancy stages and environmental impact assessment capacity is nascent. Environmental decision-making arrangements includes the FGS signing international conventions, and parliament approving Environmental Acts and Laws. However, necessary laws have not been formulated yet.

For the project implementation, this project will rely fully on World Bank ESS.

2.2. International Conventions Signed and Ratified by Somalia

The 1992 United Nations Framework Convention on Climate Change (1992). The primary purpose of the Convention is to establish methods to minimize global warming and in particular the emission of greenhouse gases. The Convention was adopted in 1992 and came into force in 1994. Somalia acceded the Convention in 2009. Somalia ratified the Kyoto agreement in 2010 and the Paris agreement in 2016.

United Nations Convention on Biological Diversity (1992). The Convention has three main goals including which are, the conservation of biological diversity (or biodiversity); the sustainable use of its components; and the fair and equitable sharing of benefits arising from genetic resources. Somalia acceded to the Convention in September 2009.

Convention on International Trade Against Endangered Species (CITES): The convention aims to protect endangered plants and animals. Somalia signed the Convention in 1985, and ratified it in 1986. It's current status is that of accession.

Vienna Convention on the Protection of the Ozone Layer: The Vienna Convention was an intergovernmental negotiation for an international agreement to phase out ozone depleting substance in March 1985. It ended in the adoption of the Vienna Convention for the Protection of the Ozone Layer. The Convention encourages intergovernmental cooperation on research, systematic observation of the ozone layer, monitoring of CFC production, and the exchange of information. Somalia ratified the Convention in 2001, and its current status is that of accession.

United Nations Convention to Combat Desertification (2002). The Convention combats desertification in those countries that experience serious droughts and/or desertification. Somalia ratified the Convention in 2002, and its current status is that of accession.

Convention on the Rights of the Child: The Convention on the Rights of the Child from 1989 is the most comprehensive compilation of international legal standards for the protection of the human rights of children. It acknowledges children as individuals with rights and responsibilities according to their age and development, as well as members of a family or community. This

includes non-discrimination, the best interest of the child, the right to life, survival and development and the right to participation. Somalia ratified the Convention in 2015.

Constitution of the International Labor Organization: The constitutional principle is that universal and lasting peace can be established if it is based on social justice. The ILO has generated such hallmarks of industrial society as the eight-hour work day, maternity protection, child labor laws, and a range of other principles. Somalia has been a member of the ILO since 1960.

ILO Convention 182 on Worst Forms of Child Labor. Ratification of this Convention makes a country commit itself to taking immediate action to prohibit and eliminate the worst forms of child labor. Some predefined worst forms of child labor include sale of a child, trafficking of children, forced or compulsory labor, commercial exploitation of children, prostitution or the production of pornography, and work by its nature that is likely to harm the health, safety and morals of children. The Convention was ratified by Somalia in 2014.

UN Convention on the Rights of the Child. The Convention is a Human Rights treaty that sets out the civil, political, economic, social, health and cultural rights of children. It defines a child as any human being under the age of 18 unless the age of majority is attained earlier under national legislation. The Convention was ratified by Somalia I 2015.

Forced Labour Convention (1930/no. 29).The key objective of the Convention is to suppress the use of forced labor in all its forms. It defines forced labor as 'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily'. The Convention has been in force in Somalia since 1960.

Rotterdam Convention: This is a multilateral treaty that came into effectiveness in 2004. The purpose is to promote shared responsibilities in relation to importation of hazardous chemicals. The convention promotes open exchange of information and calls on exporters of hazardous chemicals to use proper labelling, include directions on safe handling, and inform purchasers of any known restrictions or bans. Signatory nations can decide whether to allow or ban the importation of chemicals listed in the treaty, and exporting countries are obliged to make sure that producers within their jurisdiction comply. Some types of asbestos are listed as banned under this treaty but Chrysotile asbestos is not yet banned though there is global discussions to include it on the listed chemicals. Somalia acceded the Convention in 2010.

Convention on the Elimination of All forms of Discrimination against Women (CEDAW 1981):The CEDAW affirms that gender equality is a precursor for development and peace. It establishes legal standards for the attainment of gender equality through the elimination of discrimination against women in all aspects of political, social, economic and cultural life. It highlights the importance of equality and equal opportunity in political and public life as well as education, health and employment. Ratifying Governments are required to set in place measures to enable and expedite gender equality in law and fact as well as confronting the underlying social political inequalities that perpetrate asymmetrical power relations based on gender. Although

FGS is yet to ratify CEDAW, although the Cabinet has approved it subject to ratification by parliament.

Protocol to the African Charter on Human and People´s Rights on the Rights of women in Africa (Maputo Protocol). Somalia has signed but not ratified the Protocol

2.3. World Bank Environmental and Social Standards (ESS)

The Environmental and Social Framework (ESF) sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards. Below is a short summary of the relevant Environmental and Social Standards (ESSs) for this sub-project[4]:

ESS 1: Assessment and Management of Environmental and Social Risks and Impacts. ESS1 sets out the Client's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs). This ESS is relevant to this sub-project, and E&S risks and impacts are managed through this ESMP.

ESS 2 – Labor and Working Conditions. ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers. In order to mitigate risks and impacts in relation to labor and working conditions, the SCRP has prepared Labor Management Procedures (LMP), which are annex to the ESMF.[5] This ESMP lists the relevant procedures.

ESS 3 – Recourse and Efficiency, Pollution Prevention and Management. ESS3 recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution1 prevention and management throughout the project life cycle consistent with GIIP.

[4] ESS 7-9 do not apply to this project. There are no population groups that are included in the relevant criteria of ESS 7, and there is no cultural heritage findings expected.
[5] SCRP, Environmental and Social Management Framework, amended August 2021.

ESS 4 – Community Health and Safety. ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities. Key risks and impacts of the sub-project in regards to community health and safety relate to GBV/SEA-H, pollution and security. Consistent with this, ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. Risk mitigation measures are listed in this ESMP.

ESS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources. ESS6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. Biodiversity is defined as the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can therefore often adversely affect the delivery of ecosystem services.

ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. Habitat is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the nonliving environment. All habitats support complexities of living organisms and vary in terms of species diversity, abundance and importance. Where relevant to this sub-project, risk mitigation measures have been listed in this ESMP.

.

ESS 10 – Stakeholder Engagement and Information Disclosure. This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement has been undertaken for this sub-project, as listed below. In consideration of Covid-19 restrictions, the project has followed World Bank guidelines on community consultation under COVID-19.

2.4. Legal Gap Analysis

The following table presents a gap analysis between WB ESS and applicable local laws and regulations including corrective measures to overcome gaps and responsibilities.

Table 21 : Gap Analysis World Bank ESS and National Legal Framework

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts			
Objectives of ESS 1 are: To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs. To adopt a mitigation hierarchy approach to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigated; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible. To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or	Provisional Constitution of the Federal Republic of Somalia. Article 12 of the Constitution addresses public assets and natural resources. Article 43 provides guidelines on environmental and social safeguards that can be observed.	Laws have not been developed yet ESIAs not incorporated in federal law yet, and not strong in State-level legislation	An E&S Screening process has been followed for this sub-project in order to assess whether activities require environmental and social assessments

vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project. To utilize national environmental and social institutions, systems, laws, regulations and **procedures in the assessment, development** and implementation of projects, whenever appropriate. To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.			
ESS 2: Labor and Working Conditions			

The Objectives of ESS 2 are: To promote safety and health at work. To promote the fair treatment, non-discrimination and equal opportunity of project workers. To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. To prevent the use of all forms of forced labor and child labor. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. To provide project workers with accessible means to raise workplace concerns.	<u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose. Article 24.5 stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labour offences. Every labour law shall comply with gender equality. Dismissal for pregnancy. All women have a special right of protection from discrimination.	The new labor code, amending the code from 1972, has not been passed yet The implementation of the existing articles in practice may not be very strong	The Project does not allow any forced and child labor. It will hold all contractors liable to the implementation of the LMP The PIU will have overall responsibility to monitor the implementation of the LMP The LMP spells out a workers' grievance redress mechanism; and the GBV Action Plan provides referral pathways for cases of GB

	The Labour Code of 1972 stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.	n/a	The Project complies with WB ESS 2. This is set out in the LMP (see annex 6)
	The Labour Code of 1972. The employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances	n/a	The Project will apply OHS management system that is consistent with the WBG General Environmental Health and Safety Guidelines (EHSGs) on OHC
	The Labour Code of 1972. Workers have the right to submit complaints and the employer must give the complaints due consideration.	n/a	This ESMP sets out a workers' grievance redress mechanism
	The Labour Code of 1972. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.	Women are restricted from being employed in night work, and the specific types of work prohibited for women may be prescribed by decree. No provisions on the protection of the rights of domestic workers	The Project complies with the national law and WB ESS 2. This is set out in the LMP and this ESMP

	The Labour Code of 1972. Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.	n/a	The Project only allow deployment from the age of 15 (see LMP).However, children under 18 are not to be considered for hazardous work and the work cannot interfere with their education or be harmful for their health.

	The Labour Code of 1972. The Labor Code forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children.	Children are deployed in worst forms of child labor (forced recruitment by army, forced labor in domestic work, agriculture and herding, breaking rocks for gravel, construction work, commercial sexual exploitations) However, Somalia made efforts to construct a rehabilitation center for former child combatants and establish a Human Trafficking and Smuggling Task Force. Children are further deployed in agriculture (farming, herding livestock, fishing); industry (construction, mining and quarrying); services (street work, working as maids in hotels, domestic work, voluntary recruitment of children by army); children also perform dangerous tasks in street work Laws do not identify hazardous occupations or activities prohibited for children, and child trafficking for labor and commercial sexual exploitation is not criminally prohibited. Government does not employ labor inspectors and conducts no inspections.	The Project will only allow deployment – in all project worker categories – from the age of 18 (see LMP). Rigorous monitoring will ensure the application of the LMP.
	The Labour Code of 1972. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade union.	n/a	The project follows national law and ESS 2.
ESS 3: Resource Efficiency and Pollution Prevention and Management			

The Objectives of ESS 3 are: To promote the sustainable use of resources, including energy, water and raw materials. To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. To avoid or minimize project-related emissions of short and long-lived climate pollutants. To avoid or minimize generation of hazardous and non-hazardous waste.	Provisional Constitution of the Federal Republic of Somalia. Somalia passed its Provisional Constitution in 2012. Article 12 of the Constitution addresses public assets and natural resources. Provisional Constitution of the Federal Republic of Somalia. Article 25 of the Constitution states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.	Laws in support of the Constitution are still not available. Implementation of the laws and Constitution may be hampered due to the weak justice system	The Project promotes the sustainable use of resources and avoid or minimize adverse impacts on human health according to the Constitution and the WB's ESS3. Detailed measures are laid out in this ESMP

	Provisional Constitution of the Federal Republic of Somalia. Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. All people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment. The FGS and the governments of the FMS affected by environmental damage shall take urgent measures to clean up hazardous waste dumped on the land or in the waters of the FGS; take necessary measures to reverse desertification, deforestation and environmental degradation, and to conserve the environment and prevent activities that damage the natural resources and the environment of the nation, among other measures.		
ESS 4: Community Health and Safety			

The Objectives of ESS 4 are: To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances. To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. To have in place effective measures to address emergency events. To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities. To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams	The Somali Penal Code of 1962. The Code criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that 'carnal intercourse' and 'acts of lust omitted with violence' are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401. Art 39(i) makes abuse of power in the commission of a crime an aggravating circumstance and Article 33 provides that when a superior officer orders the commission of an offence both the perpetrator and his superior will be liable	The Somali Penal Code of 1962 fails to protect survivors and prosecute perpetrators The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and gender based violence Furthermore, in practice however it has been documented that women complaining about a rape may find themselves trapped by the Article 426 prohibition against adultery that makes no exception for the case of rape. In practice provisions under Art 39(i) offer little more than theoretical protection Domestic violence: Somalia does not have a law that specifically addresses domestic violence. Abortion for rape survivors: Art. 418-422 Abortion, with or without consent and for honor, including for women who have been raped is prohibited.	This ESMP includes risk mitigation measures to protect community health and safety
	n/a	n/a	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			

The Objectives of ESS 6 are: To protect and conserve biodiversity and habitats. To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources. To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.	Provisional Constitution of the Federal Republic of Somalia. Article 25 of the Constitution states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources. Provisional Constitution of the Federal Republic of Somalia. Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. Furthermore, all people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment.	No detailed laws govern biodiversity conservation and sustainable management of living natural resources at this point.	The sub-project does not encroach into any modified, natural, critical habitat and/or protected areas
ESS 10: Stakeholder Engagement and Information Disclosure			
The Objectives of ESS 10 are: To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into	Provisional Constitution of the Federal Republic of Somalia. Article 32 stipulated that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information	The law on the right of access to information currently only exists as a draft	Stakeholder consultations have been implemented for the sub-project. The SCRP GRM is implemented in the sub-project area

account in project design and environmental and social performance. To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.			

3. Biophysical and Socio-Economic Environment

This section describes the overall baseline condition of Somalia, and Bardhere District in Jubaland State in regards to the biophysical environment, as well as the socio-economic background. The target location is the existing Habala Adey MCH in Bardhere District. The biophysical environment of the district is in principle similar to that generally in Gedo and Somalia, with minor variations.

3.1 Proposed Project Location

The proposed project is located towards the southwestern end of Somalia in Bardhere District, Jubaland State. The district is in Gedo region, which is situated in the southwest of Somalia, bordering both Ethiopia and Kenya. Bardhere is traversed by the Jubba River, one of the two main river systems in Somalia. Figure 1 below shows the location of Gedo in Somalia, and Bardhere in specific.

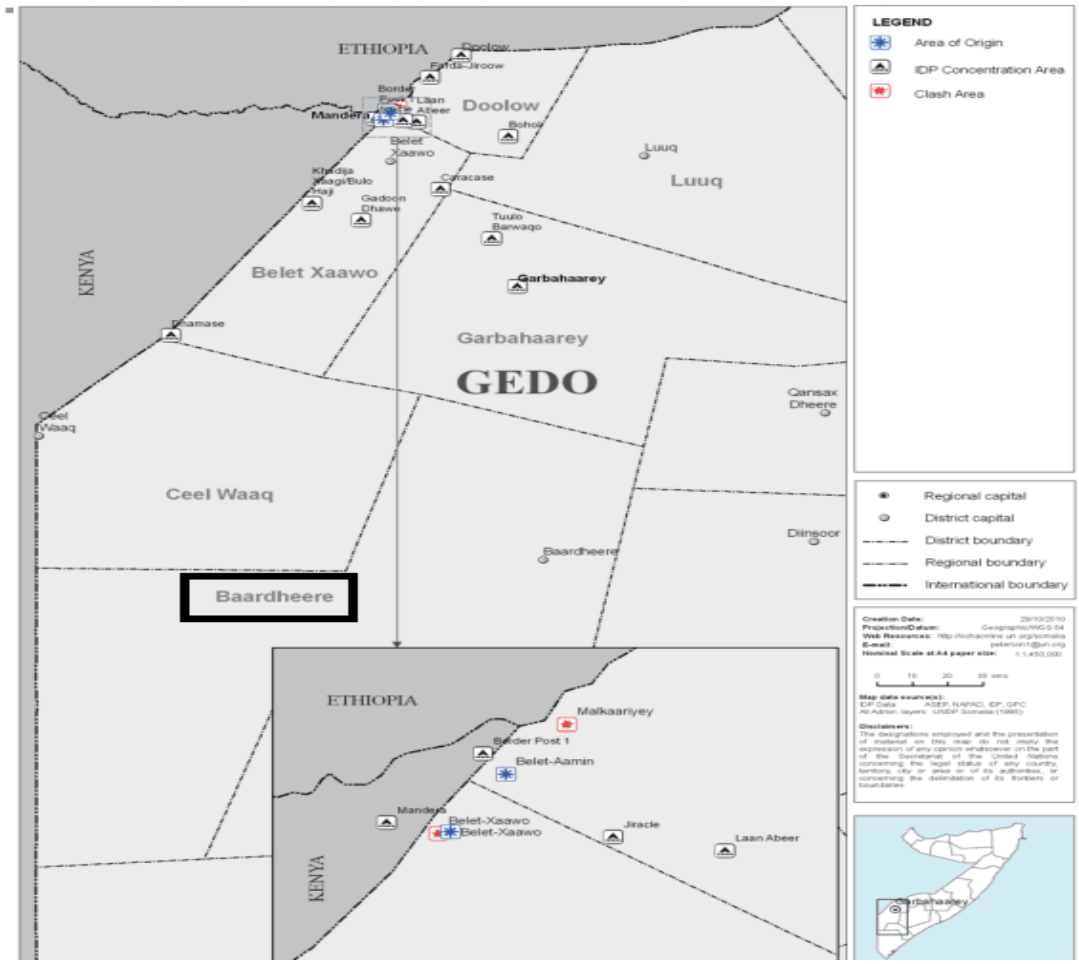


Figure 31 : Map of Gedo Region showing location of Bardhere District

The current Habala Adey MCH is located approximately 1.2km southeast of the Jubba River. The re-construction of the MCH will be undertaken at the same location. Figure 2 below shows the location of the current and proposed project site.

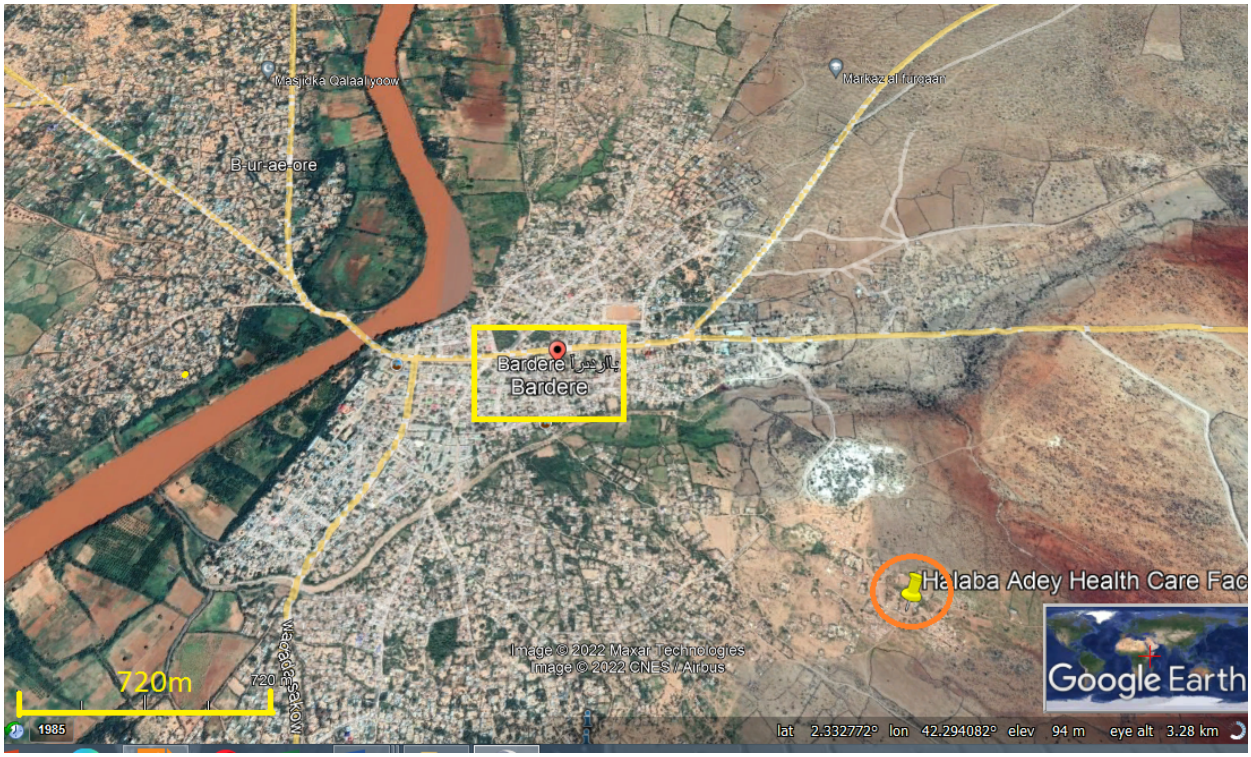


Figure 32: Habala Adey MCH shown in brown circle

3.2 Physical Environment

Topography: Bardhere town, in which Habala Adey MCH is located, is located on the flood plain of the Jubba and Shabelle rivers, in the south of Somalia. The topography within 3km of Bardhere contains only modest variations in elevation, with a maximum elevation change of 34m *feet* and an average elevation above sea level of 98m. It is therefore generally flat, with the southeast of the district gently sloping towards the north and northwest.

Geology: Key formations in Somalia include alluvium from the Pleistocene to Holocene period whose general characteristic show Older Pleistocene alluvial sediments and recent alluvium, including sandy clay with lenses of sand and fine gravel to coarse gravels and boulders. In some parts of the country are fine sands forming dunes and red soils and calcerites. Quaternary unconsolidated sediments are mostly found in the southern coast and the riverine areas of Southern Somalia.

Bardhere town lies in the Uegit formation, sandwiched between the Ambar sandstone formation to the west and the Baidoa formation to the east. Its thickness is about 350m, the rocks are limestones of calcareo-psephitic and calcareo-pelitic, with Oolithic beds and some pisolithic and coquina beds. The depositional environment varies from mesoneritic to littoral.

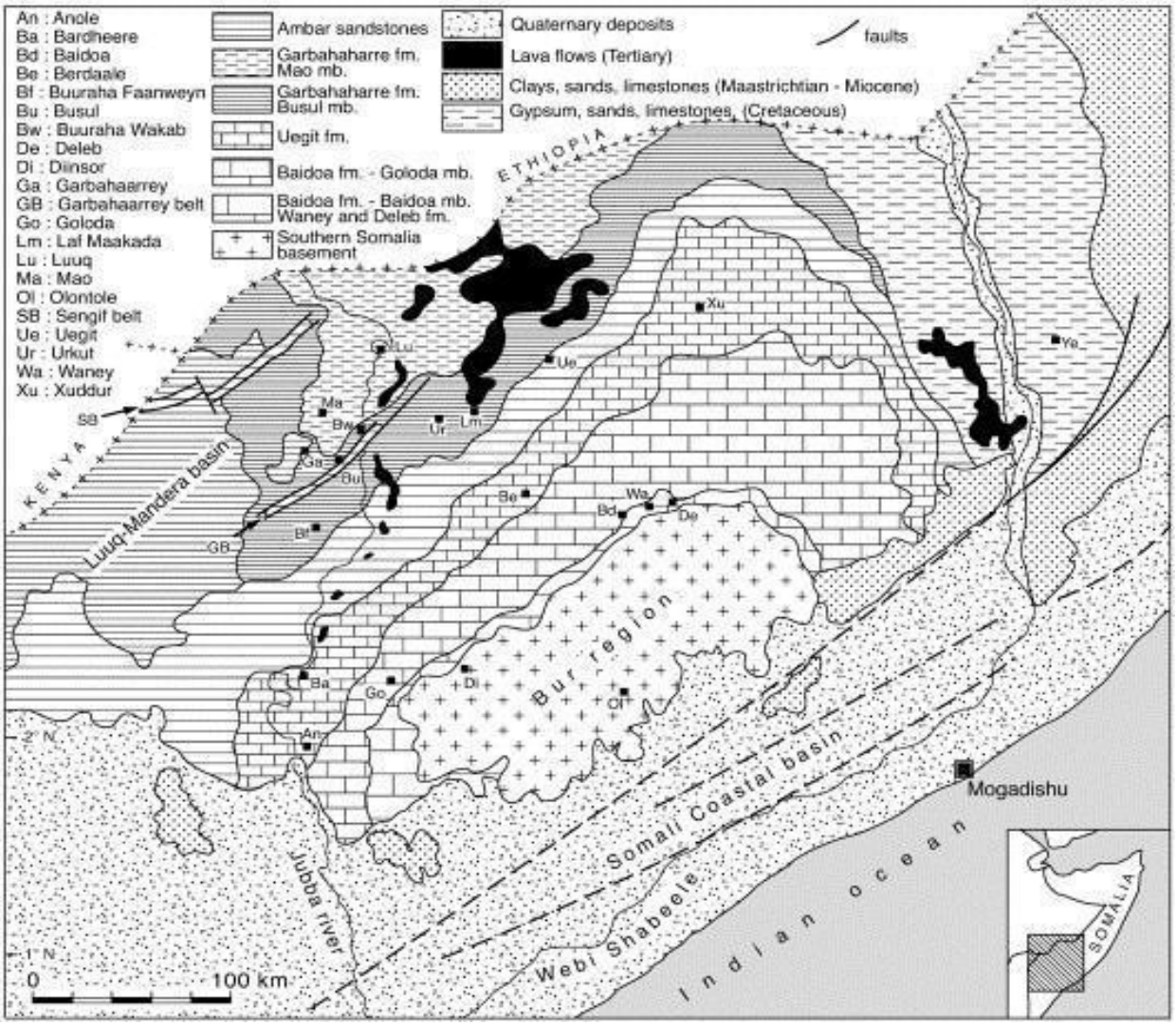


Figure 33: Geological map of the southern section of Somalia

Soils: Soils vary in a sequence related to geological formations. North of Bardhere, soils are often rocky or stony. Finer deposits are sometimes associated with *togga* (seasonal streams) and depressions containing gypseous soils. In flatter, southern sections of the limestone hills and plateaus, vertisols are the p-edominant soil type as they are in the marine plain. The intermediate zone of basement gneiss and schist has patches of lighter soils than other non-riverine areas, The surface consists of sand-loams to sand-clays[6]. All these soils including the soils around the project area are neutral to alkaline and have low levels of organic matter, nitrogen, and available phosphate.

Climate: Somalia is a large, relatively flat country, with an arid or semi-arid climate and prone to severe droughts and floods. In Bardhere, the summers are short, sweltering, and mostly cloudy; the winters are long, warm, and partly cloudy; and it is muggy, dry, and windy year round.

[6] Jubbaland Environmental and Socio-economic Studies, 1987

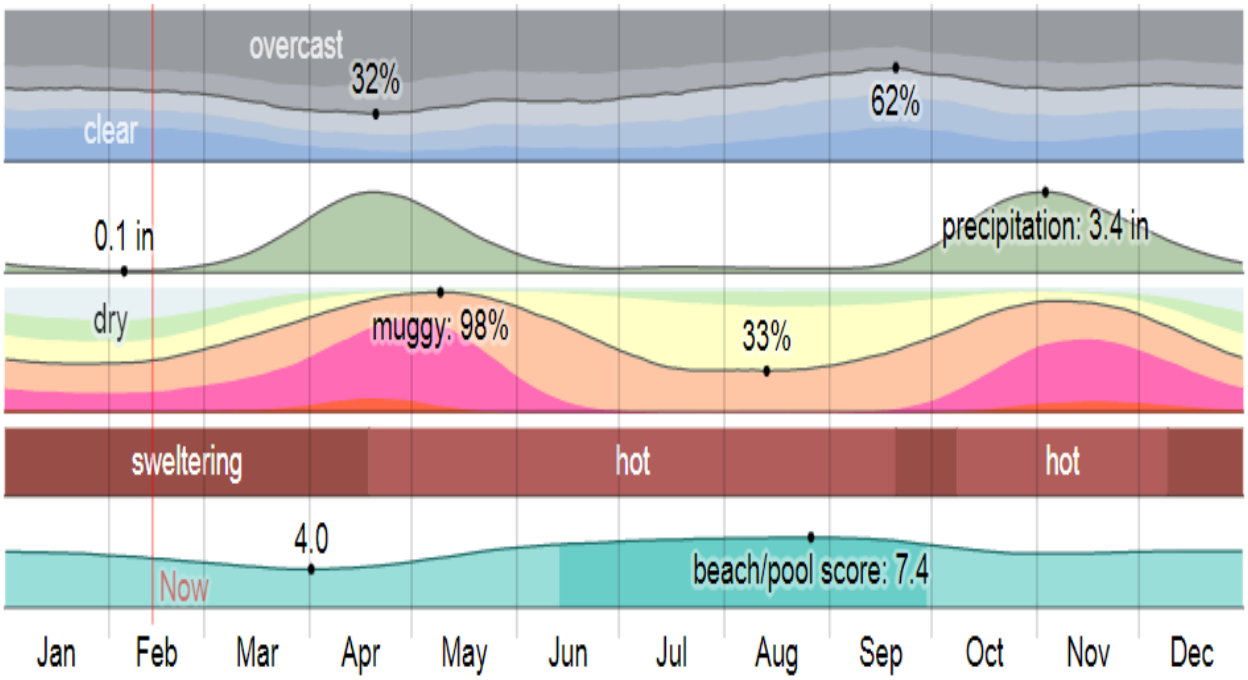
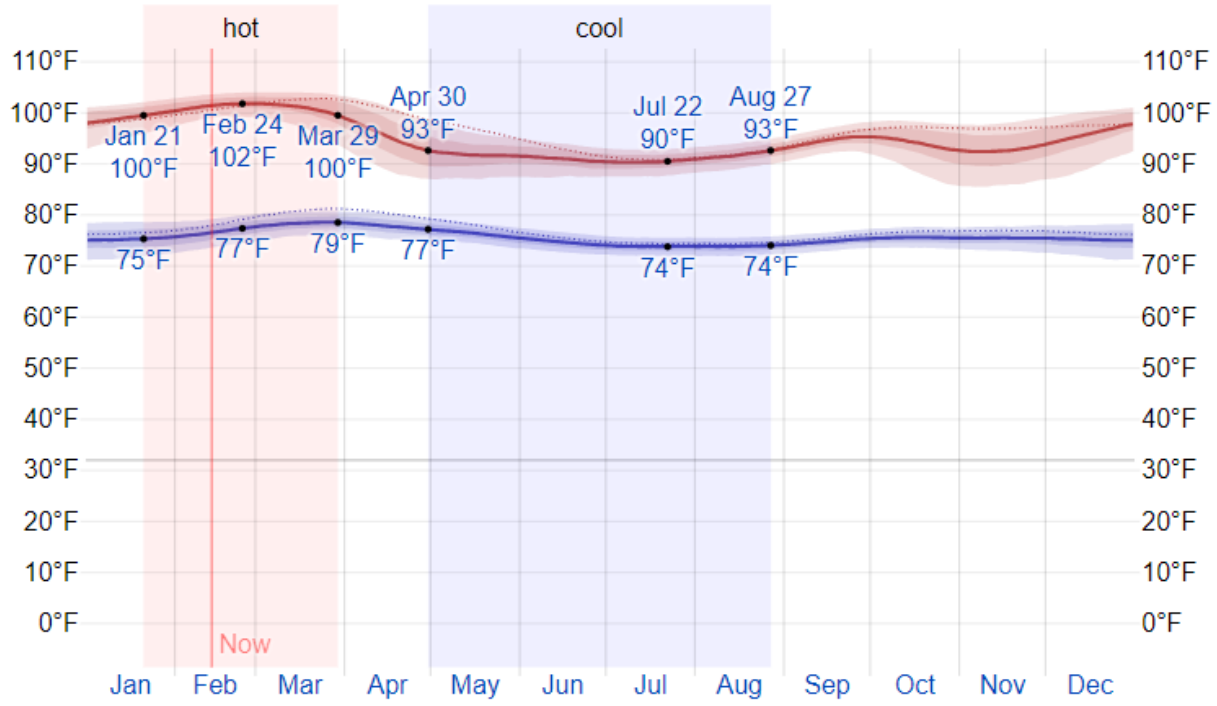


Figure 34: Climate in Bardhere District[7]

The hot season lasts for 2.3 months, from January 21 to March 29, with an average daily high temperature above 38°C. The hottest month of the year in Bardhere is March, with an average high of 38°C and low of 26°C. The cool season lasts for 3.9 months, from April 30 to August 27, with an average daily high temperature below 34°C. The coldest month of the year in Bardhere is July, with an average low of 23°C and high of 33°C.

7

Source:https://weatherspark.com/y/102275/Average-Weather-in-Baardheere-Somalia-Year-Round#Sections-Humidity



The daily average high (red line) and low (blue line) temperature, with 25th to 75th and 10th to 90th percentile bands. The thin dotted lines are the corresponding average perceived temperatures.

Figure 35 : Seasonal variations in temperature for a year[8]

Bardhere experiences significant seasonal variations in monthly rainfall. The rainy period of the year lasts for 9.7 months, from March 7 to December 28, with a sliding 31-day rainfall of at least 0.5 inches. The month with the most rain is April, with an average rainfall of 3.3 inches. The rainless period of the year lasts for 2.3 months, from December 28 to March 7. The month with the least rain in is February, with an average rainfall of 0.1 inches.

8

Source:https://weatherspark.com/y/102275/Average-Weather-in-Baardheere-Somalia-Year-Round#Sections-Humidity

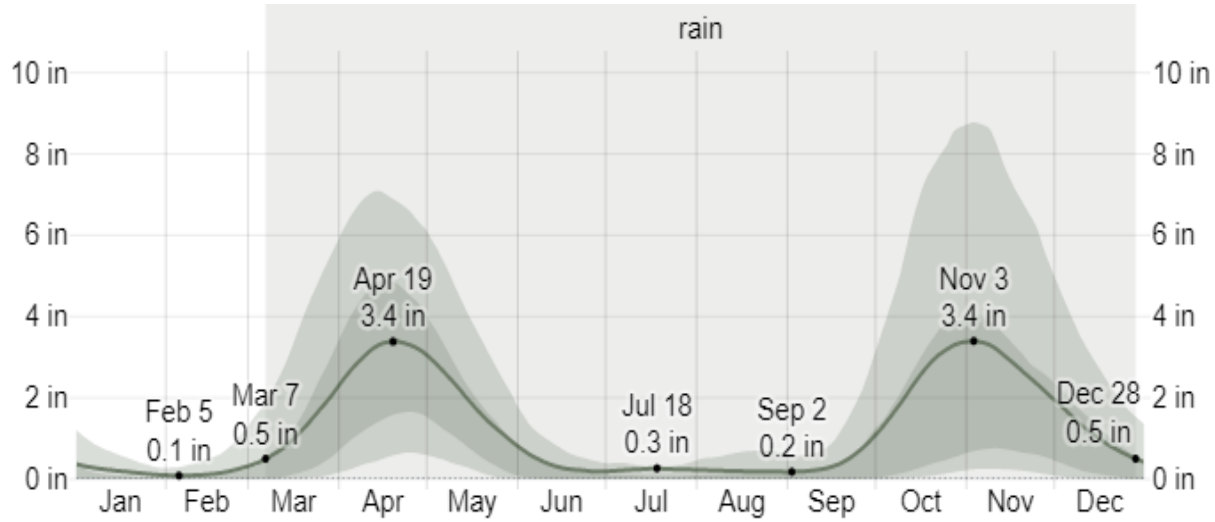


Figure 36: Rainfall pattern in the course of the year[9]

Water Resources and Hydrology: Groundwater is of significant importance in Somalia. Apart from the areas along the Jubba and Shabelle Rivers, all regions depend on groundwater for domestic water supply, livestock and small-scale irrigation. The rivers Jubba and Shebelle are the primary sources of surface water in Somalia. These two perennial rivers originate from the Ethiopian highlands in the north and flow southwards towards the Indian Ocean. The Juba-Shabelle basin has a total area of 810 427 billion square meters, of which one third each is in Ethiopia, Kenya, and Somalia.

Key water resources in the area are provided by:

- the Juba River,
- the shallow water table through temporarily hand-dug wells or more permanent boreholes
- the swamps in the flood plains of internal drainage areas
- Rainwater is also collected through run-off catchments in isolated sites in grazing areas.

The dug wells present some problems of efficiency as well as maintenance, given their state of continued collapse. Suitable structures and reliance on local energy sources (animal, wind, solar) could help relieve these problems. Salinity complicates the use of well water, with salty water currently reported in the important wells of Fahfadhun area (Bardhere district) and Garsalei (El Waq district). Salinity poses consistent limits on the development of boreholes in the area, together with maintenance difficulties.

9

Source:https://weatherspark.com/y/102275/Average-Weather-in-Baardheere-Somalia-Year-Round#Sections-Humidity

The main water supply to Bardhere town comes from the Jubba river and the water supplier is Jubba Water Supply, which currently reliably supply the community and the MCH. The water from the Jubba river is filtered and purified by the company prior to distribution to the community and the MCH.

Hydrology: The main river system in Bardhere District s is the Jubba River. This is the main surface water body that drains the district in Gedo Region. Emerging in the Ethiopian highlands, the Jubba River flow is highly variable from year to year, reflecting the great spatial and temporal variability in climate. The annual flow variation of the river could be as much as two and half times the long-term mean annual flow. In the lower sections, the Jubba River has a propensity to flood every five years. Flooding takes place more often in the Deyr season than in the Gu season. The Jubba River is estimated to reach or surpass the bank-full stage only about 30 days every five years.

Heavy rains in 2020 caused flash floods that devastated the town of Bardhere. The Jubba River flooded several neighborhoods of the town, and forced people to flee their homes. This is a repeating pattern, in 2018, people in the District had been similarly affected.

Bardhere is the second most flood-affected area in Somalia. Figure 9 below shows Bardhere with 85,900 people being affected by the recent flood. This makes it the second most hit area after Beledweyne.

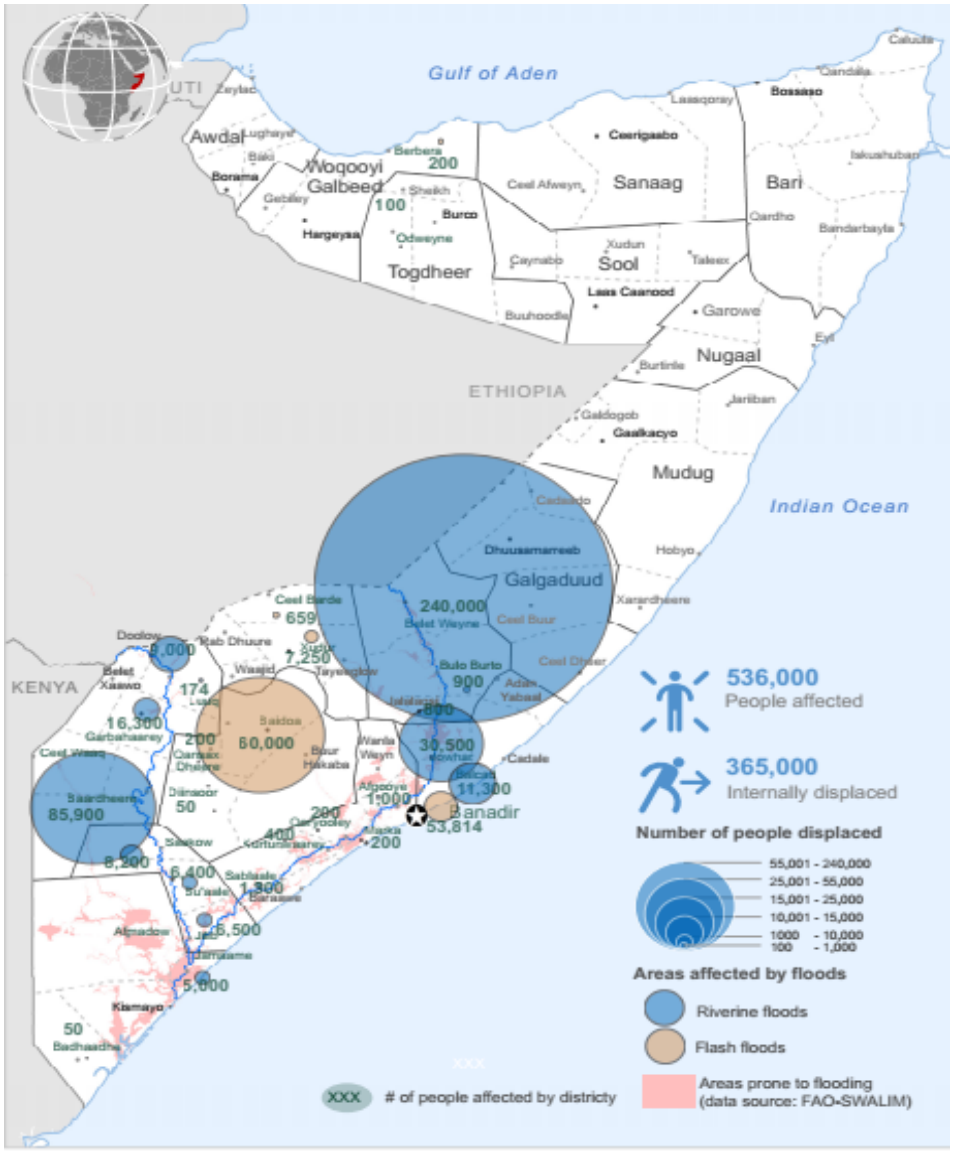


Figure 37: Map of Somalia showing Bardhere affected by riverine floods[10]

Habala Adey MCH established in 2018 is housed in a temporary building and subject to local drainage flooding purely because of poor drainage system in the area. It is reported that the facility is subject to about 300-500mm inundation depth during peak rainy season.

Biological Environment: Bardhere's biodiversity has been badly damaged over the last few decades, due to the influx of people and a sudden increase in livestock, which added great pressure on the naturally rich but fragile ecosystems. Additionally, the ecology of most of the region is structurally fragile, due to the inherent nature of the soil and rainfall patterns.

[10] Source: Somalia Flood Response Plan, 2020

The major conservation opportunities in southern Somalia are concerned with river-related ecosystems, such as the Jubba forests. The vegetation type in some very limited parts of the Jubba plains consists of woody plants, mainly shrubs with less than 6m height with trees grown sporadically here and there. The canopy cover ranges from dense to fairly open in most area. Plant species including Acacia tortilis and annual grasses, such as Chloris and Dactyloctenium are common in this area. Apart from bushland, woodland is found in Gedo region, standing to about 18m high with either open or continuous canopy, but not interlaced. However, as indicated earlier, most of these vegetation types have been turned into secondary bush through shifting cultivation that is practiced by hunter-cultivators from 1976 and compounded by the increase in livestock in the area, putting more pressure on the few scattered habitats.

The riparian forest along the banks of Jubba River has been growing along the banks and in the beds of the streams with Diospyros, Garcinia and Ficus species of trees. The vegetation around permanent watering places had been altered by cattle grazing and human activities. The riparian vegetation was described to be in good condition with little soil erosion at the time of surveys in the 1970s.

Wildlife densities are low compared with other countries in the region, which have a system of functioning reserves. In Somalia, significant economic returns from biological conservation cannot be expected in the foreseeable future. Compounded by this, towns such as Bardhere have significant influx of people and often sudden increases in livestock. As a result, the few habitats that remained to host bush animals have been destroyed.

3.2. Socio-economic Environment

The communities of Bardhere District are agro-pastoralists. The Jubba River allows Bardhere to be a major source of agricultural produce, as the river provides water for irrigation. Additionally, the land is used for grazing around the Jubba River. In short, Bardhere serves the nomadic communities and travelers.

The people of Bardhere have confined riverine agriculture to the Jubba floodplain. The riverine agriculture relies on a mixture of rainfall, flooding, and riverine groundwater to enhance agricultural production. In years with overbank flooding, flood recession, agriculture is practiced particularly in dhesheegs. In contrast, non-riverine agriculture outside the floodplain is entirely rainfed. A combination of adequate rainfall and favorable soils allows sorghum to be grown in most gu' and some deyr seasons. Rainfed farms are usually owned by people who are also riverine farmers or agro-pastoralists.

The agropastoral sector is steadily increasing in the Jubba Valley and other parts of Somalia, where crops can be grown. Livestock may be kept in the vicinity of farms, or may undertake longer migrations in search of forage with part of the family.

Crops are grown for human food and livestock fodder. True nomadism, where the whole family undergoes long seasonal migrations with their livestock, is becoming rarer. Nevertheless, camel

keepers move over great distances, sometimes encompassing the length of the Jubba Valley. Most livestock undergo substantial seasonal migrations, which preclude all or part of many households from contributing to other productive sectors. The urban sector, involved in commerce, trade, administration, and, to a small extent, manufacture, has strong links with the rural economy. Most urbanites own farms and/or livestock. These links demonstrate the diversification of most household economies. In a drought-prone country. With the added vagary of floods for many Jubba residents, diversification reduces the risk of total loss of production at a particular time. In a drought, rainfed farming fails, but some production in floodplain areas may be possible. Livestock can be moved to areas less drought-stricken, or most may survive a short drought. However, a prolonged drought forces surviving livestock to rely on whatever crop production is possible in riverine areas. Flooding may destroy a season of floodplain crops, but non-riverine farms and livestock insure against total loss of family income. Similarly, an urban income in a household provides a cushion against reduced rural production.

Administration and Governance: Bardhere District is located in the Gedo Region of Jubaland. Bardera is the largest town in the Districts, and the second largest in Jubaland, after Kismayo. Bardhere District was first made a political District in 1941.

The Baardheere District Administration is led by a District Commissioner, who was appointed by the Jubaland State. The district also has a district council, which is part of the administration of the district. According to the Fragility Index Maturity Model (FIMM) respondents, the council is representative of local sub-clans. Local revenue is generated through taxes and registration fees for businesses and NGOs. The council reportedly works with the local government to help with local stability and peace processes. The full council consists of 40 members from a wide range of sub-clans[11]. These local institutions may be able to provide support in potential conflicts or land and resettlement issues. These local institutions may be able to provide support in potential conflicts or land and resettlement issues.

Health Care Facilities: According to WHO,[12] the health indicators in Somalia are among the lowest in the world. The immunization coverage rate for measles is 46% countrywide and even lower in hard to reach areas. Only one in three Somalis have access to safe water; one in every nine Somali children dies before their first birthday; the maternal mortality ratio is 850 deaths per 100 000 live births. The health care system in Somalia remains weak, poorly resourced and inequitably distributed. Health expenditure remains very low, and there is a critical shortage of health workers.

As a result, around 3.2 million women and men in Somalia are in need of emergency health services. An estimated 1.1 million displaced people live in sub-standard conditions. There is a high risk of measles outbreaks due to crowded settlements and a high risk of acute watery diarrhoea (AWD)/cholera outbreaks due to limited access to basic sanitation and hygiene services.

[11] DTTO

[12] https://www.who.int/hac/donorinfo/somalia.pdf),

Bardhere town has a main district general hospital that serves as a referral facility for health facilities in the area including Habala Adey MCH. Other functioning health centers are run by the Somali Red Cross, HURDA and the West Bardera Maternity Unit, the East Bardera Mothers and Children's Hospital.

The target MCH for reconstruction in Habala Adey consists of a temporary iron sheet building and pit latrines, and a thicket weaved waiting room; see figure below. The MCH is estimated to receive between 45 to 55 out-patients per day. Among the services offered at the facility are:

- Outpatient services for under 5 years of age
- Outpatient services for over 5 years of age
- Ante-natal and postnatal consultation
- Normal delivery services
- Nutrition OTP (Outreach Therapeutic Feeding Program
- Vaccination services under the Expanded Programme for Immunization (EPI)

The current main building, the pit latrines, and the traditional stick woven waiting room will be decommissioned, to pave way for re-construction of a Health Care Facility, taking into consideration the parameters mentioned above.

Figure 38: Habala Adey MCH, the Main blue building in the background, is the current hospital building

Figure 39: The current Habala Adey MCH waiting room

Population: According to the population census conducted by Somali authorities with support from UNFPA in 2014, it was estimated that the Gedo Region, in which Bardhere District is located, had a population of 42240.[13]

Table 31: Population profile of Gedo region

Region	Urban	Rural	Nomads	IDPs *	Total
Gedo	76,000	177,742	144,793	76,728	508,405

*Source: UNFPA 2014

Baardheere District is mainly inhabited by the Gabaweyn people of the Gedo region. The Gabaweyn (Gabwing in their native Af-Maay dialect) are originally speakers of Cushitic languages, numbering perhaps 30,000. They are farmers who have lived on the banks of the Jubba river during recorded history. Before the colonial occupation of the area, they were ruled by the Rahanweyn-dominated sultanate in Baardheere and the trading centre at Luuq, and the Marehan nomads of the western hinterland. Culturally, economically and politically, the Gabaweyn have assimilated to their eastern Rahanweyn neighbours.[14]

[13] https://worldpopulationreview.com/countries/cities/somalia

[14] https://www.culturalsurvival.org/publications/cultural-survival-quarterly/un-and-somalias-invisible-minorities

4. Project Description

Habala Adey MCH provides out-patient services, ante-natal & post-natal consultation, emergency delivery services, and supports nutrition & vaccination programs. The reported average daily outpatient numbers is 45-55. Cases requiring specialized medical attention are transferred to the nearby District Hospital. The existing temporary buildings constructed with corrugated steel sheets are not feasible for rehabilitation, and new solid-walled buildings designed & constructed to applicable standards are required. The designed facility will be safe, and will be flood resilient.

Some of the challenges outlined by the facility operator were as follows;

- The existing structures are temporary and can easily be damaged by inclement weather.
- Due to the limited space in the main MCH; multiple functions being held in one room and cause treatment delays
- The neighborhood is mostly inhabited by the IDPs, who struggle to get maternity services.
- Lack of boundary fencing, entrance gate and the gatehouse to secure the facility
- Lack of adequate water storage tanks.
- Lack of proper waste management systems

The concept design layout was developed and presented to the State authorities (via the PIU) and received their endorsement. Following completion of the preliminary drawings, the on-site meeting was also held between the UNOPS Architect and the District Medical team to share the design and receive an endorsement on this. Habala Adey MCH is located at the following coordinates: 2°19'49.3"N 42°17'54.0"E.

4.1 Proposed Facility

In consultation with the local health authorities, UNOPS has designed this facility complete with basic amenities, such as electricity, water, sanitation, and waste management facility etc. The proposed single-storey building will measure 132 m^2. Figure 1 below shows the floor plan for the proposed Habala Adey MCH developed according to the UNOPS design planning manual.

Demolition of old building:

- Wood and corrugated iron sheets structure with cement sand screed floor.
- A woven waiting shed and a flimsy corrugated iron sheet fence.
- 2 pit latrines
- The design has been done to allow for the facility to remain in operation during construction. Due to the limitation of the site in size a phased development approach has been taken where the main building will be done in the open space currently on site as the first phase (8 months) of the sub-project while the facilities block will be done in the second phase (6 months) after demolition of the existing facility.

The main building is proposed to have the following:

- Two (2) Consultation rooms
- Delivery room
- Anta natal/post-natal
- Waiting room
- Store
- Pharmacy
- Reception
- Nutrition/EPI room
- Public washroom with separate male and female facilities
- Staff changing and washroom with separate male and female facilities
- Laundry area
- Placenta pit

Outside and separate from the main building, a proposed block for washrooms with a floor area of 26m^2 has been designed.

Other amenities and services designed for the upgrade of the existing facility include:

- water storage capacity of 13,000 litres (3,000 litres overhead tank and two 5000 litres ground level tank)
- soak pits and cesspits for wastewater management
- solar panels for electricity supply.
- Perimeter concrete wall

Construction waste**:** BoQ preliminaries allow for demolition and disposal of any construction waste according to local authority guidelines. Specification document (attached here) also outlines the handling of construction waste both on site and in transit for disposal.

Operational waste:

- **Waste water**: The proposed waste water disposal will be to a septic tank and proposed soakpit. Septic tank sludge will be disposed of as per Bardere town or District Authority approval and guidelines.
- **Solid waste**:
- **Medical waste:** Maternity functions will be included in the MCH and a placenta pit has been provided in the design to cater for the medical waste disposal of the placenta in a culturally acceptable way. The other medical waste is collected then transported to Bardhere District Hospital for incineration.
- **Non medical solid waste** will be collected into waste bins and disposed off site at an approved location as is the current practice.
- **Safe solar battery replacement**: The Electrical Specification provides for provision of O&M manuals and training on this.

The designs do not include an incinerator as the MCH will maintain the current arrangement of transporting medical waste to the main district general hospital for incineration in line with the recommendations in the ESMF to minimize the use of individual incinerators. A dirty utility room has been provided for safe storage of waste prior to transportation to the district hospital for incineration. There shall be terms and conditions that shall apply to move the medical waste from this site to the main health district general hospital.

Design for future flood prevention: Raised finished floor level of the main building is 750 mm from the current ground level to prevent damage in the event of a flood. The entire site has been raised by 300 mm to allow foa graded sloped area within the site for natural flow to stormwater drains, which have been adequately designed for within the site and along the main road to the site. Surface water for hard standings will be discharged on site and to road drainage as appropriate. The site will be graded and sloped towards the access road to aid in storm water drainage. Ground covers, shrubs and trees will be planted where necessary to improve the micro-climate.

Alongside the proposed designs are the environmental, social health and safety aspects considered which have been highlighted in the management plan. The management plan has moved further to identify possible impacts that may arise when the maternal and child health facility is now in operation.

The demolition of existing structure to pave way for the construction of a new facility shall generate rubble, which shall have to be disposed at an appropriate and legally approved site by the contractor. It will be expected of the contractor to discuss with the relevant authority prior to disposal. Further, the contractor is expected to use licensed transporter for this purpose. Comprehensive potential impacts arising from these works are elaborated in the management plan.

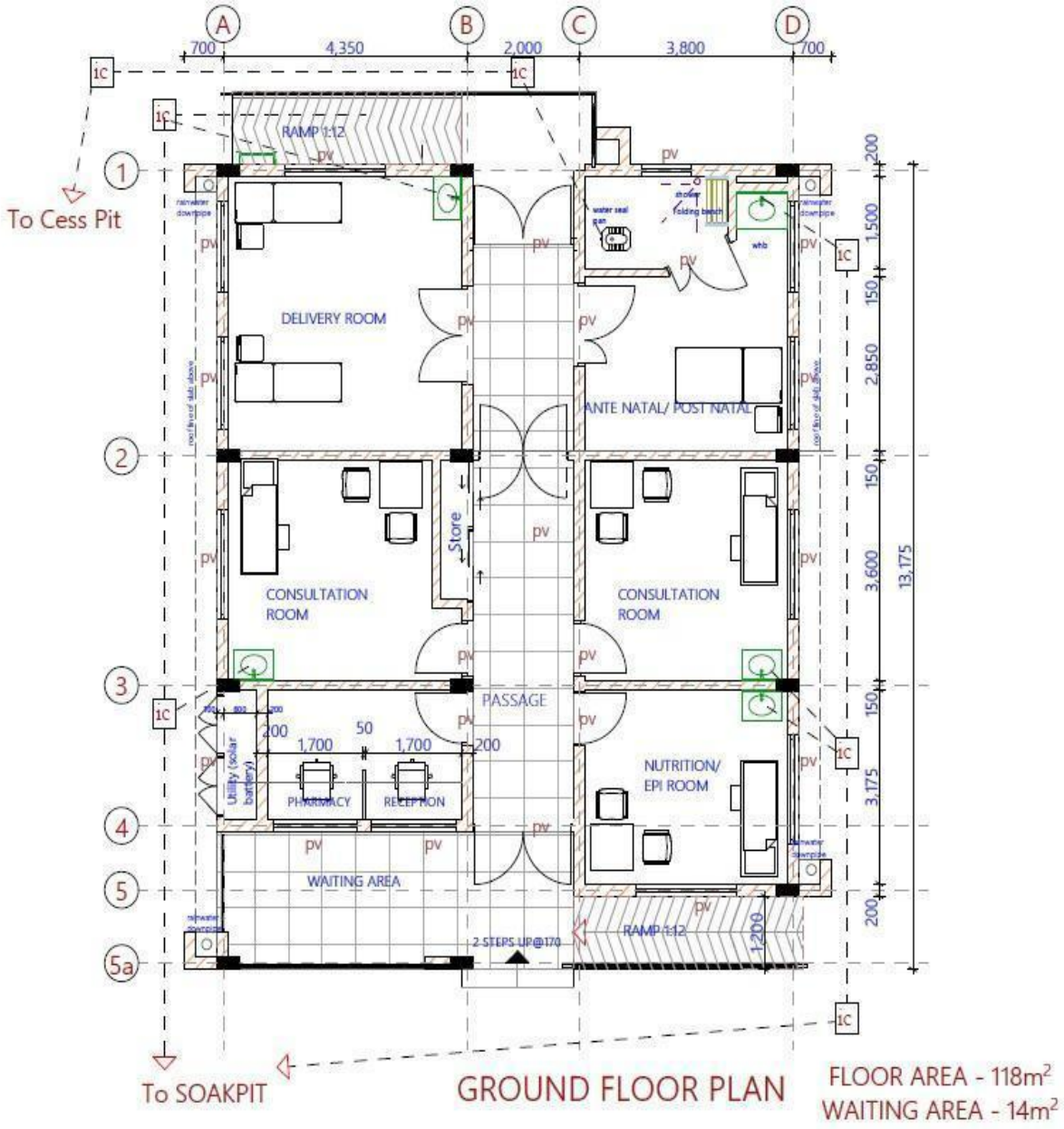


Figure 41: The proposed design for reconstruction of the MCH

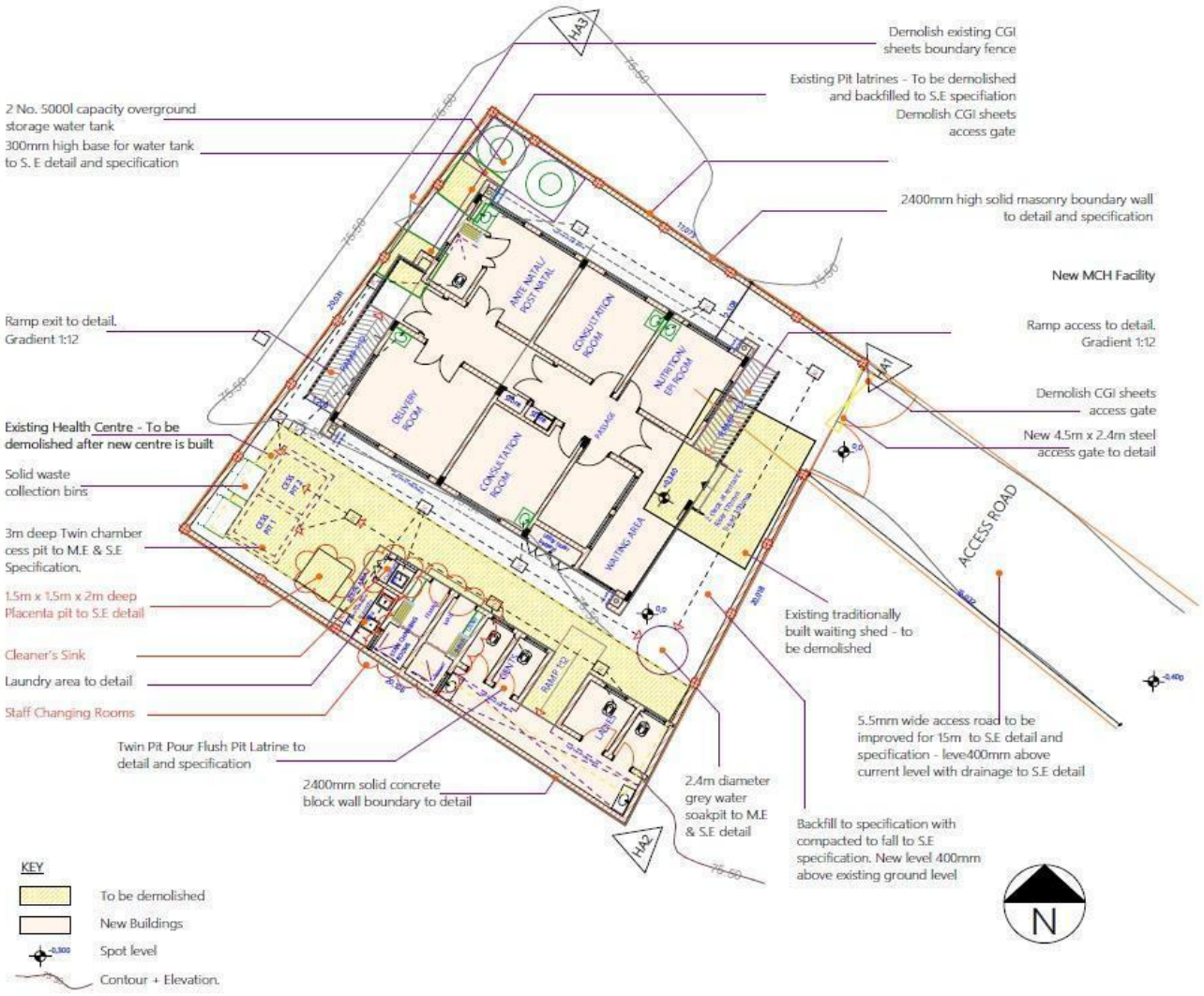


Figure 42: The proposed site plan for the reconstruction of MCH

4.2. Design Standards

Due to the lack of national standards for health infrastructure design in Somalia, regional standards applicable to Kenya were used in conjunction with references to international standards on health facility spatial planning.

Standardization of common consulting spaces was carried out in order to make the spaces adaptable and interchangeable. The building has been designed to future proof it by using standardization to regional/international standards, and thus the spaces provided can be used in the future for high tech equipment without modifying the building envelope. The following is the detailed list of design standards that were used in the design of the MCH:

Architectural Design Standards
The UNOPS Design Planning Manual for Buildings
Health Building Notes UK Government published guidelines
The Medical Practitioners and Dentists (Private Medical Institutions) Amendment) Rules, 2017 in conjunction with Health Infrastructure Norms and Standards, MoH, Government of Kenya, 2017
Local Government (Adoptive By-Laws) (Building) Order 1968 (Building code)
BS 952 part 1:1995, BS 6262:1982, BS 6206 as applicable for glazing
BS 4873:1986 BS 5286:1978 as applicable for aluminum sections

Structural Design Standards
B.S 6399-1:1996: Loading for Buildings
BS 8007: 1987: Design of Concrete Structures for retaining Aqueous liquids
CP3 Chapter V Part 2 1972: Basic Data for the Design of Buildings
B.S. 8110 Part 1, 2 and 3: Structural Use of Concrete.
Reinforced Concrete Designer's Handbook: 10th Edition by Reynolds
Steelwork Design Guide to B.S. 5950: Part 1:1990 Steel Designer's.

Electrical Design Standards
EBC of Practice and Building Regulations
IEEE wiring Regulations

Sanitary Design Standards
Ethiopian Building Code Of Standards (EBCS EN 1990:2014)
Ethiopian building proclamation. No. 624/2009 part four (water supply and sanitation)

4.3. Project Activities

Design Phase: The design phase included the following activities:

- Surveying
- Geotechnical Investigations
- Design of a layout plan

- Detailed Design (Architectural, Structural, Mechanical & Electrical) of the Main Health Facility Building MCH and other support facilities buildings.

Note: The designs do not include an incinerator because there is already an incinerator at the main district facility which shall be used to dispose all the medical waste that will be generated by Habala Adey MCH. There shall be terms and conditions that shall apply to move the medical waste from this site to the main district facility.

Construction Phase: The construction phase will mainly include the following activities:

- Demolition of existing structure and clearing
- Construction of foundation activities.
- Actual construction of the MCH main building
- Construction of separate washrooms

The basic materials requirements to undertake the re-construction of the health facility are building sand, stone aggregates, cement, concrete blocks, plumbing accessories etc. For building sand and aggregate, the contractor shall have the responsibility to source for a legal site where sand can be extracted from and this shall be approved by the engineer prior to engagement, in consultation with the local authority and any other relevant government institutions. The rest of the material can easily be sourced from block making sites. Plumbing materials shall be procured locally unless this proves a challenge; the material can be sourced from other towns.

Operation Phase: The operational phase activities will include:

- Training of the health worker in the management of generated clinical waste
- Establishment of Standard Operating Procedures for the hospital, including emergency response procedures.
- Ensuring adherence to occupational Health and Safety for the workers to avoid, among others, cross contamination from point of generation to actual incineration or final disposal.
- Operation of the MCH in full compliance with the Medical Waste Management Plan provided towards the end of this document.
- Maintenance of the solar panel to ensure they are safe from vandalism.

5. Environmental and Social Risks and Impacts

This section lists the anticipated positive and adverse impacts associated with the construction of a new Habala Adey MCH.

Positive Impacts: The health sector needs have been vast and vulnerable to recurrent natural and man-made disasters, including fluctuating levels of conflict, poverty, economic crunch, political uncertainties, drought, floods and epidemics. The burden of diseases has been heavily dominated by communicable diseases, reproductive health and undernutrition issues whereas issues related to non-communicable diseases are also on the rise. The re-construction of the MCH shall provide increased access to health care for the community in the town. There will be improved access to medical health care services by the local community.

Negative Risks and Impacts: The activities associated with the reconstruction of the MCH will likely generate adverse site-specific risks and impacts, such as:

Demolition and Construction Phase:

- Generation and disposal of material from construction activities which might be indiscriminately disposed and thus polluting the environment and the local community
- Generation of rubble (solid waste) from the existing facility, which can be an eyesore to the existing environment
- Sourcing of materials, an activity which may degrade the surrounding environment,
- Waste management, including hazardous waste and sanitation services (septic tank pumping), during operational phase,
- Security for project operations including the protection of project workers and beneficiaries,
- Labor influx and associated risks such as GBV/SEAH,
- Risks associated with labor rights and management, e.g., child labor or forced labor,
- Occupational health and safety of workers both during the construction and operational phases,
- Challenges in access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring,
- Disruption in healthcare services for the current and potential patients.
- Limitations in effective community engagements and participation,
- Community health and safety risk: traffic safety, water and sanitation safety, life and fire safety, protection from COVID-19.

Operation Phase

- Waste management, including hazardous waste and sanitation services (septic tank pumping),
- Medical wastes, wastewater and air emissions leading to contamination of the environment and the workers
- Increased air emissions from the incinerator,
- soil and water contamination,
- pollution associated with improper disposal of malfunctioned or end of life solar panels,
- Risk of infection among health professionals
- Risk of infection to the handlers
- Physical hazards (for example, handling of sharps);
- Electrical and explosive hazards;
- Fire;
- Ergonomic hazard;
- Radioactive hazard
- Poor sanitation conditions at the HCF leading to discomfort and poor aesthetic values
- Carriage of healthcare waste through public streets can be a risk in case of an accident or mare spill of health care waste

More generally, the near complete lack of environmental legislation in Somalia, and the lack of capacity of the Government to monitor and implement environmental risk mitigation and protection pose significant risks.

No land and resettlement impacts are anticipated because the proposed site is on public land and has an already existing health facility, . Community consultations have further shown that there are also no encroachments on the same piece of land. Furthermore, the project will engage local personnel for brick work and other labor requirements. These local persons will be coming from within the local community and therefore there will be no need for the establishment of a workers campsite. The engineers and supervisors will be renting a house within or from another town nearby and will have to drive to site for supervision works. There will be a site office within the designated project area but there will not be any need for workers camp.

6. Risks/Impacts and Mitigation Measures

The table below lays out the specific adverse risks and impacts anticipated for the project and the respective mitigation measures required to reduce or eliminate the projected project impacts. The adverse risks and impacts include the aspects that may arise as a result of the management of generated medical waste during the operation phase. This matrix forms the core of the ESMP, since it shows what must be done and by whom.

Table 61: Environmental & Social Management Plan: Re-construction of MCH

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts						
ESS 1	**Preparation Phase**					
	Access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring will be a challenge, as Project location is in a remote underserved areas with basic physical and community infrastructure devastated by drought and floods.	● Implement SEP and create awareness of GRM	SPT / PIU	Included in PIU staff costs Travel costs: 2,000	Records of engagement for awareness raising on GRM Stakeholder engagement records	at the beginning of activity and throughout implementation
	Construction Phase					
	Implementation of the respective mitigation measures against the negative impacts identified in this ESMP	● Provide H&S Training to the construction workforce (including sub-contractors, temporary workers and drivers) ● Raise awareness to the workforce regarding the implementation of the ESMP tailored to the project scope, through toolbox talks and other platforms	Contractor	1,000 USD for logistics	H&S Training session Record of awareness raising session	At the beginning of construction activity
ESS 2: Labour and Working Conditions						
ESS 2	**Construction Phase**					

	Risk of Insecurity of all project workers	● IPIU to prepare District Security Risk Assessment ● PIU to prepare local Security Management plan (SMP) ● Contractor to prepare local Activity Security Plan ● Implementation of SMP and local Activity Security Plan	PIU / Contractor	Costs for security risk implementation	District Security Risk Assessment Local Security Management Plan Local Activity Security Plan Mitigation measures of local Activity Plan implemented	Prior to commencement of activity
	Risk of labor and working conditions of all the workers don't comply with WB and Somali legislation – including OHS risks.	● Implement and monitor the LMP ● Listing of all staff and titles, new hires and departure ● Site visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector or auditor name	Contractor	Incl in contractor staff costs	Register provided Log book showing site visited and actions taken	monthly
	Risk of labor influx leads to increase of GBV cases	● All workers to sign CoCs. ● Dedicated reporting channel for victims through Project GRM	Contractor	Incl in contractor staff costs	Signed COCs	At start of project
	Risk of discrimination against women in employment	● Contractor to develop recruitment and retention policies that enable fair working conditions and women's safe and equitable participation. ● All workers to sign CoCs.	Contractor	Incl in staff costs	Recruitment and retention policies Signed COCs	At start of project
	Risk of delayed payment or underpayment of workers, leading to complaints and conflict	● Ensure provision of timely payment	Contractor	Incl in contractor staff costs	Records indicating that	Monthly

		● Ensure provision of workers' GRM			payments made on time Existence of Workers' GRM	
	Risks of child and forced labor resulting in employing of underage children and human trafficking	● Set-up of a workers' GRM to ensure their voices / complaints are heard ● Contractor to maintain staff records, ID copies, and perform spot checks against child and forced labor.	Contractor	Incl in contractor staff costs	Existence of Workers' GRM List of names of workers and their gender and age made available for review	At start of the project
	Risk of spreading COVID 19 at work place	● Contractor to ensure workers have access to face masks and sanitizers. ● Regular sensitization on COVID 19 to ensure workers observe the social distancing especially when in the community and public places	Contractor	Incl in contractor staff costs	Face masks and sanitizer available Sensitization session	Prior to activity commencement and throughout activity
	Risk of workers being unaware of the dangers at the site (quarries, construction site etc…) leading to injury	● Regular review and provision of PPE to the project sites ● Workers' GRM in place ● Regular fire drills	Contractor		Evidence of regular reviews conducted Workers' GRM in place Evidence of fire drill conducted	Monthly
	Operation Phase					
	Risk of medical wastes, wastewater and air emissions leading to contamination of the environment and the workers	Medical Waste ● Ensure waste is segregated at point of generation to the extent possible for easy handling ● Ensure the segregated waste is appropriately packaged in colored containers using standard clinical waste	Ministry of Health (MoH)	Incl. budget of MoH	Labelled secure bags for generated medical waste Wastewater and air	Quarterly

		color codes for respective waste type, and stored for final disposal consistent with the WHO standards Air emissions ● Rigorously segregate waste so that no PVC (IVs, etc.) waste is incinerated and instead directed to the appropriate waste bag for appropriate disposal			emissions analytical results availed for review and within statutory limits	
	Risks of physical hazards (for example, handling of sharps); Electrical and explosive hazards; Fire; Chemical use; Ergonomic hazard; Radioactive hazard	● Ensure a local risk assessment (identification of risks at work) is conducted for each process step, that is, from sample collection to disease isolation to identify specific hazards and for each identified risk, appropriate risk control measures must be defined. ● Provide safety training in the management of hazards identified other than those related to sample handling ● Provide review of Infectious Preventive Control training for the health care facility staff, including Health Care Workers charged with the responsibility to handle and dispose of the medical waste ● Ensure conducting regular fire drills	MoH	Incl. budget of MoH	Local risks assessment conducted every year and specific hazards identified for each and way forward Regular safety training provided Review of training provided Fire drills conducted every 6 months	Monthly
	Risk of infection among health professionals	● Ensure appropriate training on Infectious Prevention and Control for healthcare workers and other staff. ● WHO prescribed protocols for personal protection of healthcare professionals is to be enforced at all times ● Ensure training in Health care waste management systems, which enable health care waste to be managed	MoH	Incl. budget of MoH	# of trainings held and who has been trained Protocols available at location Trainings held	At start of the clinical operations

		responsibly, without harming the community or the environment. ● Staff engaged in medical waste management should wear PPE. ● Staff engaged in auxiliary activities, such as food supply, medical waste management should wear PPE. ● Medical waste should be treated as infectious clinical waste Category B (UN3291) [30] and handled in accordance with healthcare facility policies and local regulations			Staff wears PPE Staff wears PPE Records of medical waste treatment	
	Risk of infection to the handlers	Segregate medical/health care waste at generation point	MoH	Incl. budget of MoH	Medical waste segregated at source to avoid double handling	monthly
	Risk of infection to the handlers due to secondary handling	Place the different types of medical/health care waste in secured bags color-coded and labelled	MoH	Incl. budget of MoH	Medical waste in secured bags which are colour coded and labelled	monthly
ESS 3: Resource Efficiency and Pollution Prevention and Management						
ESS 3	**Construction Phase**					

	Impacts of generation of solid waste which is the constructionand demolition waste and rubble that may be generated from demolition of existing structure	● Ensure disposal of generated solid waste at designated and authorized disposal site consistence with the local and international requirements (see WBG General EHS Guidelines)[15] ● Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal by the contractor – Project GRM ● Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, cultivation fields, irrigation channels, natural drainage paths, wetlands and critical habitat, the existing waste management system in the area, local routes, and general aesthetic value of the area	Contractor	waste management costs 10,000 USD lump sum per site	Records of amount of solid waste disposed, where and when Records of Project GRM and addressed grievances Records of amount of solid waste disposed, where and when	monthly

[15] WBG EHS Guidelines, Waste Management, accessed at: https://www.ifc.org/wps/wcm/connect/456bbb17-b961-45b3-b0a7-c1bd1c7163e0/1-6%2BWaste%2BManagement.pdf?MOD=AJPERES&CVID=nPtgwEW

	Risk of poor sanitation facilities and sanitation conditions condition at work site	● Provide proper water closet toilet facilities at all long term (> 1 month) work sites. ● Do not allow water to run out at toilets. ● Maintain all toilets in clean and sanitary condition. ● Provide proper earth pit latrines at all work sites where work will be undertaken for periods of up to one month. ● Fill the latrines in once they become full and when site work is complete. ● Do not allow site workers to defecate in the open anywhere on the site or in its vicinity. ● Add the use of sanitation arrangements in toolbox talks	Contractor	5,000 USD	# of water closet toilet facilities available % of toilets leaking Toilets are well maintained # of latrines provided % of latrines filled # of workers openly defecating Sanitary arrangements part of toolbox talk	monthly
	Risk of pollution from construction wastes and water use	● Resource efficiency measures will be analyzed and incorporated	Contractor	Incl in contractor staff costs	Efficiency measures available	Commencement of project
	Risks of demolition activity	● Asbestos containing materials removal should be considered as well as electrical equipment containing PCB	Cntractor		Asbestos containing materials removed	monthly
	Operation Phase					
	Risk of indiscriminate disposal of medical waste	● Ensure incineration of all the produced medical waste and a record of the amount incinerated kept	MoH	Incl. budget of MoH	Record of dates and quantities incinerated	monthly

ESS 4: Community Health and Safety						
ESS 4	**Construction Phase**					
	Risk of increased GBV/SEAH cases and risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors by project workers	● Implementation and monitoring of GBV / SEA Action Plan ● GBV awareness sessions for community ● GBV awareness sessions for workersEngage a dedicated specialist to support oversight and management of these risks ● Workers to sign COC	PIU	Incl in PIU staff and travel costs	Activities under GBV/SEA Action Plan implemented # of GBV awareness sessions # of sessions # of specialists engagement % of workers that have signed CoC	monthly
	Risk of spread of communicable diseases (SIIs , HIV/AIDS, COVID-19 etc..) between workers and the community	● Community awareness sessions on communicable diseases ● Implement COVID-19 protection measures	PIU	Incl in PIU staff and travel costs	# of community sensitization % of workers that have signed CoC % or works with access to face masks and sanitizer	monthly
	Risk of exposure of community members to physical hazards on project sites.	● Undertake safety precautions to address safety hazards for the nearby community, ● Sensitize the local community on the activity of type project and inform them about construction risks	Contractor	Inc in Contractor budget	# of sensitization measures	At commencement of activity

	Impacts of dust, air pollution and noise generation	● High level maintenance of the vehicles to reduce the vibrations ● Selecting equipment with lower sound power levels ● Installing suitable mufflers on engine exhausts and compressor components ● equipment casing ● Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance.	Contractor	Inc in Contractor budget	% of vehicles well maintained % of engine exhausts with mufflers installed % of activities implemented during the days	At commencement of activity
	Operation Phase					
	Risks of carriage of healthcare waste through public streets can be a risk in case of an accident or mare spill of health care waste	● Transportation of medical waste will be done according to the WHO specifications which guides that during transportation, a defined route is used always and the vehicle is well labelled to indicate its transporting hazardous materials. ● Ensure the quantities of medical waste transported is recorded before leaving the HCF and also recorded at incineration point to account for every medical waste that is moved from the HCF.	MoH	Incl. budget of MoH	# of times the defined route for transportation of medical waste and the vehicle properly labelled # of times records are made available	monthly
	Risk of poor sanitation conditions at the HCF leading to discomfort and poor aesthetic values	● Provide cleaning staff with adequate cleaning equipment, materials and disinfectant. Provide adequate facilities to disinfect the cleaning equipment and dispose of the used consumables in a safe manner; ● Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.	MoH	Incl. budget of MoH	Cleaning equipment available Effective cleaning system % of cleaners trained	monthly

		● Train cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials)				
ESS 10: Stakeholder Engagement and Information Disclosure						
ESS 10	**Preparation Phase**					
	Risks of poor access to beneficiaries lead to less meaningful community engagements and difficulty in monitoring for social harm	● Implementation and monitoring of GRM	PIU	PIU GRM costs	% of complaints filed have been addressed	monthly
	Risks of lack of information on access to GRM leads to lack of accountability	● Awareness raising on GRM	PIU	PIU budget for GRM	# of awareness sessions of GRM	quarterly
	Lack of information disclosure leads to lack of transparency and suspicions of mismanagement of the sub project	● Conduct in- depth community engagement, providing information on the sub project ● Implement SEP	PIU	PIU budget for stakeholder engagement	# of community engagement sessions held	quarterly

7. Implementation Arrangements

7.1 Government Institutions Responsibilities

The work implementation will be managed by the Project Implementation Unit (PIU) embedded within the SCRP institutional structures. The PIU will be contracting a construction company directly to implement construction works. The construction company will implement the project including all Environmental and Social (E&S) mitigation measures defined in this ESMP.
Below is the list of Government institutions involved in Habala Adey MCH reconstruction implementation, with their respective roles and interests.

Table 71: Institutional partners responsibilities

Project Implementation Unit - PIU	The application of mitigation measures required under this ESMP is the sole responsibility of the PIU. However, since actual construction works will be carried out by the private entity, the PIU will ensure that implementation of the ESMP is incorporated in the Request for Proposals (RfPs) and the costs are integrated in the Bill of Quantities (BoQs), and subsequently in the legal agreement between the construction company and the PIU. The PIU is responsible to instruct, observe and monitor its contractors against the ESMP provisions. The PIU should make sure that corrective actions are applied by the contractors, when necessary. The PIU can also undertake the monitoring itself if deemed necessary. The PIU will request for any violations to be corrected by the Constructor and monitor the actions and undertakings in correcting violations.
State Project Team - SPT	The SPT's Environmental & Social Safeguards Specialist will monitor the implementation of risk mitigation measures by the construction company. The monitoring will be supported by the PIU / SPT Engineers and the Community Consultation Specialist. Environmental and social monitoring reports will be prepared by the SPT and submitted to the PIU every month throughout the project duration.
Ministry of Public Works (MoPW)	MoPW - the responsible State Ministry on all infrastructure development and maintenance has been engaged in the design development consultation and the certification process. The MoPW's technical staff will be engaged in the supervision of the work implementation by the Contractor.
District Commissioner	The District Commissioner (Municipality) representing the local community and the interest will be engaged in the day to day coordination of the work implementation by the Contractor. The District Commissioner will be specifically involved in facilitating stakeholder engagements, assisting the Contractor in the recruitment of local workers and ensuring the security to the Contract staff and the supervision teams. The District Commissioner will be the first point of contact for the local communities for raising construction activities related inquiries.
District Medical Officer (DMO)	The DMO will be engaged in ensuring the facility meets the necessary technical standards as specified in the design.

UNOPS	UNOPS Engineers and Safeguard team will be available to provide advisory level support to the PIU during the works implementation on technical and safeguard compliance related matters.

7.2 Contractor

The Contractor is responsible for complying with requirements for all field activities covered by this ESMP. Contractors are also responsible for the actions of any subcontractors they may engage. Subcontractors also have to comply with all E&S standards as laid out in this ESMP. Contractor's responsibilities include:

- Ensure that all operations comply with the environmental and social standards laid out in this ESMP and in the Project's ESMF.
- Ensure that the control measures provided for in the ESMP are both understood and implemented by site personnel.
- Comply with accident and incident reporting as laid out in the ESMF. All severe incidents must be reported to the PIU within 48 hours of occurrence.
- Set up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies.
- Ensure compliance with all mitigation measures in this ESMP.
- Monitor the ESMP implementation, against the monitoring indicators laid out in the ESMP Table.
- Participate in Community Consultative Meetings.
- Identify additional significant matters pertaining to environmental and social compliance.
- Liaise with the SPT/PIU Environmental and Social Safeguards Specialists on the need for corrective action in the event of unexpected environmental or social problems emerging during the course of operations.
- Communicate with all of the contractor's staff regarding environmental and social compliance requirements and other matters of importance.
- Identify additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Prepare reports on all aspects of environmental and social compliance.
- Maintain lists of all workers, including their age and gender.
- Maintain a workers' grievance mechanism.
- Prepare and maintain an OHS Plan, and provide training to all workers on OHS Plan.
- Ensure signing of code of conduct by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.

The contractor is obliged to implement this ESMP with all risk mitigation measures assigned to it.

E&S Safeguards or Environmental Health and Safety (EHS) Specialist: The contractor will deploy an E&S or EHS Specialist as an addition to the team to ensure operationalization of this ESMP,

including monitoring, supervision and reporting on mitigation measures. The key tasks of the Specialist include the following;

a) Ensure PPE for workers is available and workers are trained in its use
b) Provide OHS training to all workers, based on the OHS Plan
c) Ensure health and safety of all workers at the construction site
d) If necessary, stop the works to ensure safety
e) Maintain records of accidents and incidents and ensure appropriate reporting of incidents to the PIU/SPT
f) Ensure waste management procedures are followed closely
g) Ensure availability of water and sanitation facilities for all workers at site and at the campsite
h) Conduct toolbox talks for workers
i) Train all workers in the CoC and ensure that CoC is signed by every worker
j) Liaise closely with the SPT/PIU Teams on training workers on GBV issues, as well as community awareness on GBV
k) Maintain workers' lists indicating age and gender
l) Liaise closely with the SPT/PIU Teams on the implementation of Project GRM
m) Maintain records of Workers' GRM

8. Reporting on ESMP Compliance

The PIU will prepare periodic monitoring reports, including inputs from the Contractor and the SPT, on the status of implementation of ESMP. The reports will be submitted to World Bank for their review and feedback as part of the PIU's general Quarterly report to the Bank. Details of these reports and their content are given in Table 4 below. A template for an Environmental and Social Monitoring report is included in Annex 2.

Table 81: ESMP Monitoring and Compliance Reports

#	Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
1	ESHS Monitoring Report to PIU	Compliance status of the Project with the environmental and social mitigation and monitoring measures. The report should cover: • environmental incidents; • health and safety incidents, • health and safety supervision: • Usage of PPEs by workers • worker accommodations for foreign workers; • highlights of inspection • Training conducted and workers participated • Workers grievances • Community grievances • Chance find (if any)	Monthly	Contractor/SPT
2	ESMP Monitoring Report to WB	Compliance status of overall Project with ESMP requirements	Quarterly	PIU
3	Incident Reports	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to address the future recurrence of this event	Initial investigation report for severe incidents within 24 hours. Detailed Investigation Report within ten days	PIU (contractor/SPT to PIU_

9. Capacity Building and Training

The proper implementation of the ESMP is highly dependent on the available existing capacity and awareness of the PIU, the SPT and the contractors' staff, the surrounding community and the concerned stakeholders.

Training workshops are required to increase the environmental awareness of all individuals concerned with the Project and to train and follow up with the workers who are specifically involved in the site operation.

On-site workers should receive appropriate training to undertake the duties of implementing the necessary mitigation measures. The training workshops should cover at least the following issues:

- Occupational and public health and safety.
- Mitigation measures to be applied.
- GBV/SEA/SH prevention
- HIV/AIDS prevention
- Proper handling and storage of hazardous material and wastes.
- Spill contingency plans
- Accidents and emergency plans
- Roll-out of GRM among workers and communities
- Appropriate segregation, transportation, final disposal of solid waste and fire safety.

This will be achieved by small workshops conducted in the induction phase for the workers. The induction training will include familiarization with the workers' GRM, Project GRM, CoC, GBV/SEA/SH, HIV/AIDS prevention, COVID-19 measures, and other toolbox talks as mentioned above in the ESMP. During the construction phase, refresher trainings will be held. s. While some training will be provided by the contractor, the PIU has assessed that training on GBV/SEA/SH and GRM should be conducted by the PIU directly, given a potential lack of capacity among contractors.

10.Stakeholder Consultations

The preparation of the ESMP and of the project selection and design was highly dependent on stakeholder consultations, conducted as per the SCRP Stakeholder Engagement Plan (SEP).

Initially the PIU and UNOPS Teams traveled to Jubaland in February 2021 for a joint assessment mission to identify flood-affected roads, among other infrastructures (see Annex 1 for participants of consultations). During this field assessment mission, district and community level consultations were held in Jubaland. At this point, the specific site was not yet decided on and the objective was to identify the key needs of the local communities and to allow for the prioritization of specific flood-affected infrastructure. Key issues for consultations included the provision of all sub-project related information to affected communities, ensure coordination between the SCRP and local authorities and community structures, receive feedback and comments on the identification of projects, receive feedback and comments on the potential environmental and social risks of the identified projects and planned mitigation measures, and discuss investment sustainability, as well as familiarize communities with the Project GRM. In addition, after the consultations, the SCRP provided project information through its website, flyers directly distributed in communities, and radio shows. The list of attendees is included as Annex 1 of this document. The consultations consisted of separate sessions with different types of stakeholders, including local authorities.

District Level Consultations: On February 16, 2021, the field assessment team met with the local government officials and community leaders in Bardhere. The meeting was attended by local government officials and community leaders in Bardere, the District Commissioner Mr. Ahmed Artan, Chief of Police Mr. Abdiaziz Hassan, officials from various ministries, youth and women's representatives, community elders, business people and religious leaders.

All those who addressed the meeting spoke about their immediate priority needs and listed the following:

- Construction of flood management structures to prevent future flooding of the city
- Bridges on streams that run through the city (Kurman stream and Toga Sakow Road stream)
- Rehabilitation of roads
- Rehabilitation and construction of MCHs
- Construction of river water treatment facilities.

Sessions with community members: Community elders and clan chiefs stated that they regularly faced floods, drought and locust which is common and recurrent in their district, they stated that their vulnerability has increased significantly and they need urgent assistance on WASH and road construction.

The elders also stated that after Beledweyne, (Shabelle river) Bardhere is the second most flood-affected district in Somalia, given its proximity to the Juba River. The elders stated that key effected locations and priorities are:

1- Gurmaan lake – in the central of the town (requires new bridge)
2- MCHs
3- Inner roads
4- Main market

Sessions with the business community: The business community in the district stated that due to recurrent floods in the district, the economic status has been badly affected and losses have been recorded, this is due to recurrent flooding caused by the over-flowing of the Juba river and canals being destroyed. They also indicated that the roads transporting goods into the district have been badly affected by floods, which have caused vehicles to charge higher prices for transport.

Sessions with youth: The youth in the district expressed views on the increasing unemployment in Bardhere and the lack of opportunities caused by recurrent disasters in the district, such as drought and floods. This has led to the fact that no companies operate in the District. The youth have identified their areas for intervention and rehabilitation Kurmaan bridge, Main road in the town, Airport Road and Bardhere Primary School.

Sessions with IDP members: Members of the IDP community in Bardhere consist of some of the most vulnerable populations. The IDP community stated that Habala Adey MCH provides services for more than 16 IDP Camps, and it requires immediate rehabilitation and assistance with medical equipment. They have also stated that the Kurmaan Small Bridge is very important to the population movement during the floods and needs rehabilitation. The IDP community requested that wells be constructed in their camps to provide sufficient water as they usually use the river water which is unhealthy.

Sessions with women: The Women's Association of Bardhere stated that during the floods the most vulnerable people are mother and children, as they are affected the most. Women are the key bread winners of the families. They requested that the Airport Road be constructed as it is the most important in assisting travels of goods into the district. The women also stated that the MCHs are made of iron sheets and are affected by heavy rain-falls and need rehabilitation urgently.

Figure 101: Consultations in Bardhere with Local Government and IDPs

Once the rehabilitation of the MCH was decided on, follow-on site visits and stakeholder engagements were undertaken:

Table 101: Details of the stakeholder consultation

Date	**Type of Consultation**	**Stakeholders Consulted**	**Issues discussed**
2 - 6 March 2021	Stakeholder consultation and initial Assessment (field visit)	The District Commissioner Mr. Ahmed Artan, Chief of Police Mr. Abdiaziz Hassan, officials from various ministries, youth and women's representatives, community elders, business people and religious leaders.	Flood risk to the community Prioritization of infrastructure for rehabilitation works Security assessment and accessibility Beneficiaries community - potential impact of reconstruction of the health facility
1 May 2021	Design Questionnaire Input (Via email & Phone)	District Medical Office (DMO). Health Facility Operator (International Office of Migration-IOM)	Collected data and information on patient numbers, facility operations, current support infrastructure, services being provided etc as input to design development.
26 June 2021	Government Design Standards	MoH FGS Engineer, National Institute of Health (NIH) Director, PIU Engineer	Confirm existing standard plans or design guidelines for health facilities to be used nationwide to guide SCRP on the process.
22 August 2021	DMO / Operator Consultations (virtual)	District Medical Office (DMO). Health Facility Operator (International Office of Migration-IOM)	Confirm client design input on requirements
26 August 2021	DMO/ Operator Consultations (virtual)	District Medical Office (DMO). Health Facility Operator (International Office of Migration-IOM)	Preliminary Layout Discussions
15 September 2021	Architectural Site Analysis and Inventory (Field Visit)	District Medical Office (DMO). Health Facility Operator (International Office of Migration-IOM)	Confirmation of site infrastructure services, building materials availability, discussion of proposed design.

9 November 2021	State MoPIC, MOH, MoPW and DMO review of final site plan and floor plan layout	State MoPIC, State, MoH,MoPW, District Medical Officer (DMO)	Approval of site plan and floor plan layout
22 December 2021	World bank Review (via email)	World Bank Health Technical Lead (Dr. Bernard Olayo)	Review of Facility architectural design for Health requirements.
In progress as of 20 January 2022	Client Review: Technical Review of the Detailed Design Review (via email)	Hirshabelle State (Ministry of Public Works) Engineers	Detailed design review i.e. Review of detailed design drawings, specifications document, Design reports

11. Grievance Redress Mechanisms

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.[16] One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances'.[17] This Project GRM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SCRP provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the SCRP.

As per World Bank standards, the GRM operates in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines (see GBV/SEAH and Child Protection Prevention and Response Plan in the ESMF[18]). It also operates in addition to specific workers' grievance redress mechanisms, which are laid out in the LMP (also part of the ESMF).

The GRM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

The GRM Value Chain is presented in Annex 2.

[16] Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed. The World Bank's Good Practice Note on 'Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works' spells out requirements for a GBV grievance redress mechanisms, which will be defined in a separate GBV/SEA and Child Protection Risks Action Plan.

[17] World Bank, Environmental and Social Framework, 2018, p. 131.

[18] Somali Crisis Recovery Project (SCRP), Environmental and Social Management Framework, amended August 2021

12. Implementation Budget

Table 121: Implementation Budget

	Required Resources	Costs in USD
PIU – Monitoring of ESMP		
1.	Human Resources: 1 Environmental, 1 Social Safeguards Specialist	PIU staff costs
2.	1 GBV Specialist (GBV training and GRM)	PIU staff costs
3.	1 Security Specialist	PIU staff costs
4.	1 Stakeholder Consultation Specialist	PIU staff costs
5.	1 GRM Specialist (GRM awareness)	PIU staff costs
6.	Logistics / Travel	PIU travel budget
Grievance Redress Mechanism hotline		
7.	Hotline and other mechanisms	PIU GRM budget
8.	GBV/SEAH reporting mechanisms	PIU staff costs
Implementation of Risk Mitigation Measures Contractor		
9.	Human Resources 1 EHS Specialist x 4 months	8000
10.	Cost of PPE	2000
11.	Cost of OHS and other Training	1000
13.	Construction Waste Disposal	10000
14.	Safety Signages	1000
15.	Community engagement	Included in staff costs
16.	Latrines	5000
17.	Security Costs	6500 +tbd
	TOTAL	**27 000**

13.Conclusions

The proposed construction of the Habala Adey MCH is conducted under Component 2 of the Somalia Crisis Recovery Project (SCRP). The project aims to build a modern MCH at Bardhere District as part of reconstruction of flood damaged infrastructure.t The proposed Habala Adey MCH will be equipped to adequately serve the most vulnerable in society, which includes the IDPs that have set up camp right outside the proposed facility location. The proposed facility will also provide a temporary holding for patients who require more urgent attention before being transferred to the main hospital.

This ESMP was prepared to help mitigate potential environmental and social risks and impacts. The risks and impacts for the proposed construction of the Habala Adey MCH were classified as moderate, mostly consisting of typical civil works related risks and impacts. The proposed project is being constructed on public land where the existing HF is located, and there are no land nor resettlement issues triggered by the sub-project. Additionally, it is not expected that the sub-project will disturb private business owners within the local community. However, at sourcing construction materials, it will be the responsibility of the contractor in consultation with the engineer, to ensure relevant permits are obtained to access such materials from authorized locations. in relation to the proposed site.

The ESMP is prepared to help guide the PIU, SPT and the construction company on environmental and social risk mitigation measures to be implemented throughout the works to ensure compliance with all SCRP E&S instruments, World Bank Environmental and Social Standards (ESSs) and local legislation.

References

Assessment of the biodiversity in terrestrial and marine landscapes in the Jubaland and surrounding areas

EASO Country of Origin Information report; South and Central Somalia, August 2014

FAO/SWALIM, Hydrological Survey and Assessment, 2012, accessed at: http://www.faoswalim.org/content/w-20-hydrogeological-survey-and-assessment-selected-areas-somaliland-and-puntland-report-no

https://www.culturalsurvival.org/publications/cultural-survival-quarterly/un-and-somalias-invisible-minorities

Jubbaland Environmental and Socio-economic Studies, 1987

UNFPA, Population Estimation Survey, 2014, accessed at: https://www.nbs.gov.so/population-estimation-survey-2014?

UNDP, Somalia Annual Report, 2014, accessed at: https://www.so.undp.org/content/somalia/en/home/library/human_development/publication_22.html

UNHABITAT, Bardera Urban Profile, 2020, accessed at: https://unhabitat.org/sites/default/files/2020/12/beletweyne_urban_profile.pdf

SCRP, Environmental and Social Management Frameworks (ESMF), 2020.

The World Bank, Good Practice Note. Addressing Gender-Based Violence in Investment Project Financing involving Major Civil Works, September 2018

World Bank, Environmental and Social Framework, 2018

Annex 1: Community Consultations: Stakeholders Consulted

Jamhuuriyadda Fe`deraalka Soomaaliya
Wasaaradda Maaliyadda
Mashruuca ka soo kabashada Xasaradaha Ee Soomaliya

جمهوريه الصومال الفيدراليه
وزارة المالية
مشروع إنعاش الأزمات في الصومال

The Federal Government of Somali
Ministry of Finance
Somalia Crises Recovery Project (SCRP)

Date: 16 February 2021

Subject: Attendance Sheet Field Mission Berdere

No	Name	Title	Telephone
1	Ahmed Xiish Carta	Deputy District Commissioner	0617775005
2	Mohamud Ibrahim Salaad	Director of Social affairs	0615223415
3	Ahmed Adan Ibrahim	Security Chief District	0618563881
4	Sacid Abshir Cartan	Coordinator of Farm	0611011111
5	Mohamed Xaaji	Second Deputy of Commissioner	0616891000
6	Abdiqadir Adan Osman	Head of Projects District	0612202209
7	G/L Abdi sheikh Hassan Elmi	Station Commander	0619930200
8	Zakira Ayub Mohamed	DMO Berdere	0617775040
9	Adam Shaif Abdi	IDPs	0615657788
10	Ismail Omar Mohamed	Director of IDPs	0615811780
11	Muhumad Cadow Cabdile	IDPS	0617133353
12	Farah Hirsi Guhad	DDR	0615550730
13	Sheikh Farhan Mohamed	Director of Religious	0615812970
14	Siyad Dhaqane Muhumed	Religious leader	0615812936
15	Adan Rukow Abdi	Village Commissioner (Horseed)	0617555031
16	Hussein Adan Warsame	Community elders and clan chiefs	0615812912
17	Dhaqane Abdullahi Mohamed	Community elder	0615833421
18	Hassan Ali Hassan	Village Commissioner (Buula Geedi)	0612555847

19	Ibrahim Mohamed Omar	Village Commissioner (Masawa)	0618987063
20	Dahar Rashid Sahal	Director of Youth	0619991213
21	Shire Abdirisaq Mohamed	IDPs	0617776956
22	Ibrahim Hassan Wardhere	Religious leader	0616409170
23	Siraji Mohamed Bashir	Youth	0613309694
24	Qaadid Abdi Mohamed	IDPs	0615162638
25	Mohamed Muhamed Ali	Community elder	0616990801
26	Mohamed Adan Macalin	Farmer	0612600300
27	Adan Farah Ali	Water Chairman	0612774422
29	Ibrahim Sheikh Hussein Muse	Farmers Chairman	0516669633
30	Bahsir Nor Ahmed	Business Chairman	0619060999
31	Barre Shuriye Garad	Youth	0618975427
32	Nor Shire Omar		0615706640
33	Mohamed Muhamed Ali	Community Elder	0616990801
34	Quresho Adan Omar	Chairwoman Women's organization	0615831840
35	Mohamed Ibrahim Macuush	Community Elder	0615393366
36	Abdi Bile Baldos	Community Elder	0617555412
37	Mukhtar Abdi Hassan	Youth	0617555880
38	Abdiqani Muse	Stakeholder Engagement, PIU	0618303838
39	Adan Abdi Adan	Senior Project Coordinator , UNOPS	0615918230
40	Eng. Khalid Mohamed	Civil Engineer, UNOPS	0615764977
41	Eng. Abdinur Farah	Project Engineer, PIU	0617895176
42	Eng. Mohamed Mohamud	Civil Engineer, UNOPS	0612186799

Annex 2: Grievance Redress Mechanisms

This annex describes the Project GRM's objectives and the steps of the GRM Value Chain in more detail.

GRM Objectives

The key objective of the GRM is to establish a prompt, easy to understand, consistent and respectful mechanism to support the receiving, investigating and responding to complaints or grievances from project stakeholders. It is designed to offer project stakeholders an opportunity to seek and receive grievance redress; to strengthen the project's team ability to identify, track, resolve and refer eligible grievances; and to enhance the Project's development results and outcomes. The GRM is expected to contribute to continuous improvement in performance of the SCRP through an analysis of trends and lessons learned. The GRM does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

The SCRP has contracted a GRM Focal Point, Halima Farah. It further has put in place a hotline with the number '337'.

Types of Complaints Expected

Categories of Grievances
1. Basic information
- Access to information
- Correction and deletion of untrue or misleading information that affects the person
2. Ethics and conduct
- Government entities and staff
- Implementing Partner staff
4. Violation and breach of codes of ethics
- Violation of codes of ethics;
- Breach of the code of ethics by government officers:
- Breach of Code of Conduct and Ethics by staff of Implementing Partners
5. Violation of human rights and fundamental freedoms
- Gender equality and general equality matters.
- Equality and freedom from discrimination (Equality -every person; Equality of men and women to opportunities in political, economic, cultural and social)
- Economic and Social Rights (health, sanitation, freedom from hunger, adequate and quality food, clean safe and adequate water, social security, education, emergency medical treatment)
- Non-discrimination of special needs groups
6. Corruption and Economic crimes
- Unethical conduct
7. Labor and working conditions
- Termination/Summary Dismissal,
- Breach of Employment Contract Terms
- Conflicts with Trade Unions

- Work Injury
- Discrimination
- Sexual Harassment
- Remuneration
- Wrongful termination
- Suspension
- Waiver of Claims
8. Environmental compliance violations
- Violation of environmental standards laid out in the ESIAs, ESMPs, and ESMF
9. Occupational Health and Safety (OHS)
- Violation of occupational health and safety measures and standards laid out in the ESMF, ESMPs
11. Gender-Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH)
- Gender based violence committed by project personnel or any worker on the Project, or GBV committed in relation to the Project
- Sexual Exploitation and Abuse committed by Project staff or any worker of an IP associated to the Project
- Sexual Harassment committed by Project staff or any worker of an IP associated to the Project

Available Channels

A phone number for a hotline operator: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator is available from 8.00 am to 5.00 pm every day through a toll-free number. The hotline operator is set up and managed by the Project Implementation Unit (PIU). Any concerned party can call the hotline number and file a grievance with the Project. Hotline Operators will respond in Somali or English.

A help desk must be set up by the respective IP during the implementation of sub-project activities in an area.[19] They should be manned by the IP staff, especially its community project facilitators, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regards to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk.

Relevant assigned personnel available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the contractor, IP or the local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box.

A suggestion box must be installed at the nearest local administration office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in

[19] The help desk must be budgeted by the IP, the manning of the help desk will depend on the nature of the activity

writing. Suggestion Boxes are installed at the closest official administration office in the sub project area. Boxes are clearly marked as SCRP-related feedback and grievance mechanism.

Processing Steps

Step 1: Grievance Uptake

Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

GBV/SEA/SH-related Grievance: Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on GBV/SEA/SH-related grievances. No grievance uptake mechanism cannot reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of GBV/SEA/SH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centered approach from mandatory reporting.

Step 2: Sort and Process

All registered grievances will be transferred to the GRM Focal Point at the respective IP at state or national level – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM focal point will categorize the complaint according the table above (section on 'Categorization of Grievance'). Worker-related grievances will be handed over to a workers' GRM (see below). Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the IP has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GRM operators and relevant project staff (see below).

For grievances handled under the general Project GRM, the GRM Focal Point will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based on the priority of the grievance, and make a judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g. at the court). The focal point should offer the complainant option/s for resolution of their grievance.

GBV/SEA/SH: All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will

be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded and the case will be considered closed.

Step 3: Acknowledgement and Follow-Up

The respective IP will decide whether a grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

Step 4: Verify, Investigate and Act

The IP, the GRM Focal Point, will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redress action and plan.

Grievance Category	Required Action
Queries, comments and suggestions	Acknowledgement / Clarification
Complaints and concerns which do not require formal investigation	Grievances should be handled and resolved by the immediate manager within the GRM structure, e.g. the GRM Focal Point or a dedicated staff. The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.
Complaints and concerns that involve allegations that require investigation or interventions of a different kind	As appropriate, conduct verification, negotiation, mediation or arbitration, coordination with respective authorities, decision-making, escalation to judicial or administrative institutions, proposed solutions, implementation of agreed actions, etc… The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.

Step 5: Monitor, Evaluate and Provide Feedback

The IP/GRM Focal Point will provide feedback to GRM users and the public at large about:

- results of investigations;
- actions taken;
- why GRM is important;
- enhance the visibility of the GRM among beneficiaries; and
- increase in users' trust in the GRM

Response Times

Type of Case	Actions Required	Response Required
Straight-forward cases with little anticipated complications	minimal checks and consultations	- Acknowledge reception of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if need be, and communicate outcomes and next steps based on outcomes - 1-3 days
Cases that require some minimal processes	delete misleading information, collect information, analyze existing information, prepare communication materials to disclose delayed information, clarify existing information, and correct misleading information	- Acknowledge reception of the grievance, detail the steps to follow, and provide the appropriate practical timelines - 7 -14 days
Cases that requires investigation	access and review of relevant documentation (reports, policy documentation), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches	- Acknowledge reception of the grievance, provide follow-up steps and set timelines for a comprehensive response - 14 to 21 days
Cases that require escalation to higher SCRP implementation level	Transfer case to relevant higher level (e.g. state-level or national HQ of IP; PIU)	- Acknowledge reception of the grievance, provide the need for escalation of the grievance to the next project implementation level, and set timelines for a comprehensive response - 7-14 days
Cases that require referral to other institutions	Transfer case to relevant institution (National Police Service, World Bank)	- Acknowledge reception of the grievance, provide the need for referral of the grievance to an appropriate institution, and set timelines for a comprehensive response on referral progress - 7 - 21days

Other Redressal options

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected

communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service.

Annex 3: World Bank Environmental and Social Standards (ESS)

The ten Environmental and Social Standards establish the standards that the Borrower and the project will meet through the project life cycle, as follows:

ESS 1: Assessment and Management of Environmental and Social Risks and Impacts. ESS1 sets out the Client's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

ESS 2 – Labor and Working Conditions. ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers, including full-time, part-time, temporary, seasonal and migrant workers.

ESS 3 – Recourse and Efficiency, Pollution Prevention and Management. ESS3 recognizes that economic activity and urbanization often generate pollution to air, water, and land and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution1 prevention and management throughout the project life cycle consistent with GIIP.

ESS 4 – Community Health and Safety. ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience acceleration or intensification of impacts due to project activities.

ESS 5 – Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement. ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term "involuntary resettlement" refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

ESS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources. ESS6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. Biodiversity is defined as the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can, therefore, often adversely affect the delivery of ecosystem services.

ESS 8 – Cultural Heritage. ESS8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. People identify with cultural heritage as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions. Cultural heritage, in its many manifestations, is important as a source of valuable scientific and historical information, as an economic and social asset for development, and as an integral part of people's cultural identity and practice. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle.

ESS 10 – Stakeholder Engagement and Information Disclosure. This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Annex 4: Environmental and Social Monitoring Template

This annex present a template that should be used for the E&S monitoring process by the SPT/PIU monitoring team.

Table 7 Environmental Monitoring Plan

Risks and Impacts	Mitigation Measures	Indicators	Responsibility	Monitoring Frequency	Findings/Observations	Corrective Action

Annex 5: Code of Conduct for Workers

International Labor Conventions and Recommendations: The International Labor Standards (i.e., Conventions and Recommendations) have served as the foundation on which much of this Code of Conduct is based.

1. Scope of Application:
It is expected that these principles apply to contractors, suppliers and their employees, parent, subsidiary or affiliate entities and subcontractors. It is expected that contractors ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all. This Code of Conduct provides the minimum standards expected. In addition, contractors should note that certain provisions of this Code of Conduct will be binding in the event the contractor is awarded a contract by the Project pursuant to the terms and conditions of any such contract. Failure to comply with certain provisions may also preclude contractors from being eligible for a contract award.

2. Continuous Improvement:
The provisions as set forth in this Code of Conduct provide the minimum standards expected of contractors. It is expected that contractors strive to exceed both international and industry best practices. It is also expected that contractors encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct. It is recognized that reaching some of the standards established in this Code of Conduct is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions accordingly.

3.Management, Monitoring and Evaluation:
It is the expectation that contractors, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. It is expected that contractors will establish and maintain appropriate management systems related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. Contractors participants in the Global Compact are strongly encouraged to operationalize its principles and to communicate their progress annually to stakeholders.

Labor:

4. Freedom of Association and Collective Bargaining: It is expected that contractors recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

5. Forced or Compulsory Labor: It is expected that contractors prohibit forced or compulsory

labor in all its forms.

6. Child Labor: It is expected that contractors do not employ: (a) children below 14 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.

7. Discrimination: It is expected that contractors ensure equality of opportunity and treatment in respect to employment and occupation without discrimination on grounds of race, colour, sex, religion, political opinion, national extraction or social origin and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place. It is expected that contractors take all appropriate measures to ensure that neither themselves nor their parent, subsidiary, affiliate entities or their subcontractors are engaged in any gender-based or other discriminatory employment practices, including those relating to recruitment, promotion, training, remuneration and benefits.

8. Wages, Working Hours and Other Conditions of Work: It is expected that contractors ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned. Suppliers should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement and suppliers should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by suppliers should be not less favorable than the best conditions prevailing locally (e.g. collective agreements covering a substantial proportion of employers and workers / arbitration awards / applicable laws or regulations) for work of the same character performed in the trade or industry concerned in the area where work is carried out.

9. Health and Safety: It is expected that contractors ensure, so far as is reasonably practicable, that: (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health; (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

Human Rights:

10. Human Rights: It is expected that contractors support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

11. Harassment, Harsh or Inhumane Treatment: It is expected that contractors create and maintain an environment that treats all employees with dignity and respect. It is further expected that contractors, as well as their parent, subsidiary and affiliated entities along with any subcontractors, will neither use or engage in, nor allow their employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse violate universally recognized international legal norms and standards and are unacceptable behavior and prohibited conduct. Prior to entering into agreements, contractors are informed of the standards of conduct with respect to the prohibition of sexual exploitation and abuse, expected. Such standards include, but are not limited to, the prohibition of: (i) engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent, (ii) exchanging any money, employment, goods, services, or other things of value, for sex, and/or (iii) engaging in any sexual activity that is exploitive or degrading to any person. It is expected that contractors take all appropriate measures to prohibit their employees or other persons engaged by the suppliers, from engaging in sexual exploitation and abuse. It is also expected that contractors create and maintain an environment that prevents sexual exploitation and abuse. Contracts will contain provisions concerning a supplier´s obligation to take appropriate measures to prevent sexual exploitation and abuse. The failure by a supplier to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action when sexual exploitation or abuse has occurred, constitute grounds for termination of any agreement. Moreover, no harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

12. Mines: It is expected that contractors do not to engage in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

Environment:

13. Environmental: It is expected that contractors have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

14. Chemical and Hazardous Materials: Chemical and other materials posing a hazard if released into the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

15. Wastewater and Solid Waste: Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal**.**

16. Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be

characterized, monitored, controlled and treated as required prior to discharge or disposal.

17. Minimize Waste, Maximize Recycling: Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Ethical conduct:

18. Corruption: It is expected that contractors adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery.

19. Conflict of Interest: It is expected that contractors disclose any situation that may appear as a conflict of interest, and disclose if any official or professional under contract may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

20. Gifts and Hospitality: No invitations to sporting or cultural events should be accepted, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners. It is expected that contractors do not offer any benefit such as free goods or services, employment or sales opportunity to staff members in order to facilitate the contractors´ business with the Project entities.

21. Post-employment restrictions: Post-employment restrictions may apply to staff in service and former staff members who participated in the procurement process, if such persons had prior professional dealings with suppliers. Contractors are expected to refrain from offering employment to any such person for a period of one year following separation from service.