



MINISTRY OF FINANCE

FEDERAL GOVERNMENT OF SOMALIA

# ENVIRONMENTAL IMPACT & SOCIAL ASSESSMENT REPORT

PROPOSED NEW MINISTRY OF FINANCE  
HEADQUARTERS

MOGADISHU, BANAADIR, SOMALIA

TO BE FUNDED UNDER THE  
ECONOMIC GOVERNANCE  
INSTITUTIONAL SUPPORT PROJECT  
(EGISP)



**PROPOSED DEMOLITION AND CONSTRUCTION OF NEW MINISTRY OF FINANCE HEADQUARTERS LOCATED AT MOGADISHU, BANAADIR, SOMALIA, TO BE FUNDED UNDER THE ECONOMIC GOVERNANCE INSTITUTIONAL SUPPORT PROJECT (EGISP)**

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**Environmental and Social Impact Assessment (ESIA) for**

**The Demolition and Construction of FGS Ministry of Finance Offices Building**

**to be funded under the**

**Economic Governance Institutional Support Project (EGISP)**



**Ministry of Finance**

**MAY 2025**



## DECLARATION

We, the undersigned, hereby declare that this ESIA Study Report represents the facts about the proposed **Demolition and Construction of the FGS Ministry of Finance Offices Building** at Mogadishu, Somalia by the Ministry of Finance.

## DETAILS OF THE EXPERT WHO CONDUCTED THE ESIA

**Erick Omondi Oloo, E & S Expert, NEMA**

**Sign:**

A handwritten signature in blue ink, appearing to be "Erick Omondi Oloo".

**Date: 17<sup>th</sup> June 2025**

## Table Of Contents

|                                                                        |    |
|------------------------------------------------------------------------|----|
| DECLARATION.....                                                       | 2  |
| Table Of Contents.....                                                 | 3  |
| List of Tables.....                                                    | 8  |
| List of Figures.....                                                   | 9  |
| ABBREVIATIONS AND ACRONYMS .....                                       | 10 |
| EXECUTIVE SUMMARY .....                                                | 12 |
| CHAPTER 1: INTRODUCTION.....                                           | 45 |
| 1.1. Background.....                                                   | 45 |
| 1.2. Project Goal .....                                                | 48 |
| 1.3. Objective of the ESIA .....                                       | 48 |
| 1.4. Specific Objectives of the ESIA .....                             | 49 |
| 1.5. Purpose of the ESIA.....                                          | 50 |
| 1.6. Scope of the ESIA.....                                            | 51 |
| 1.7. Approach and Methodology for the Preparation of the ESIA.....     | 51 |
| 1.8. Project Components .....                                          | 53 |
| 1.9. Alternatives to the project .....                                 | 54 |
| 1.10. Structure of the Report.....                                     | 56 |
| CHAPTER 2: PROJECT DESCRIPTION.....                                    | 57 |
| 2.1. Project Overview .....                                            | 57 |
| 2.2. Project Location .....                                            | 57 |
| 2.3. General Site Layout, Size, Capacity & Functional Allocation ..... | 58 |
| 2.4. Project components.....                                           | 62 |
| 2.5. Project Phases .....                                              | 62 |
| 2.6. Project/construction history .....                                | 65 |
| 2.7. Proposed Construction schedule, staffing and support.....         | 65 |
| 2.8. Facilities and services .....                                     | 67 |
| 2.9. Project Activities/Operations.....                                | 69 |
| 2.10. Required off-site investments .....                              | 79 |
| 2.11. Anticipated life span of the proposed building .....             | 80 |

|                                                                                                              |     |
|--------------------------------------------------------------------------------------------------------------|-----|
| <b>CHAPTER 3: POLICY, ADMINISTRATIVE AND LEGAL FRAMEWORK</b>                                                 | 81  |
| 3.1. National Legal Framework                                                                                | 81  |
| 3.2. State Level Environmental and Social Regulations and Guidelines                                         | 89  |
| 3.3. International Conventions Signed and Ratified by Somalia                                                | 91  |
| 3.4. The African Development Bank's Environmental and Social Standards (AfDB)                                | 93  |
| 3.5. Capacity assessment of Somalia's public entities in charge of ESA enforcement and oversight             | 104 |
| <b>CHAPTER 4: BASELINE ENVIRONMENTAL AND SOCIAL CONDITIONS</b>                                               | 108 |
| 4.1. Dimensions and Boundaries of the Study Area and Surrounding Areas Likely to be Environmentally Affected | 108 |
| 4.2. Physical Location and Project Settings                                                                  | 110 |
| 4.3. Physical Environment                                                                                    | 112 |
| 4.4. Biological Environment                                                                                  | 121 |
| 4.5. Socio-Economic and Cultural Environment                                                                 | 124 |
| 4.6. Occupational and Community Health and Safety                                                            | 133 |
| 4.7. Environmental and Social Screening Checklist                                                            | 134 |
| 4.7.1. Site Surveys of the Project Area                                                                      | 134 |
| 4.7.2. Environmental and Social Screening Checklist Form                                                     | 135 |
| <b>CHAPTER 5: STAKEHOLDER CONSULTATIONS</b>                                                                  | 141 |
| 5.1. Introduction                                                                                            | 141 |
| 5.2. Objectives of the Consultation Workshop                                                                 | 144 |
| 5.3. Notifying Stakeholders of the ESIA                                                                      | 144 |
| 5.4. Methodology and Approach                                                                                | 145 |
| 5.4.1. Stakeholder Engagement Strategy                                                                       | 145 |
| 5.4.2. Sharing of Reports and Documents                                                                      | 147 |
| 5.4.3. Grievance Mechanism                                                                                   | 147 |
| 5.4.4. Grievance Register (GR)                                                                               | 149 |
| 5.4.5. Grievance Handling Procedure                                                                          | 150 |
| 5.5. Stakeholder Analysis Matrix                                                                             | 151 |
| 5.6. Project Site Context and Stakeholder Scope                                                              | 152 |

|                                                                                     |            |
|-------------------------------------------------------------------------------------|------------|
| <b>CHAPTER 6: IMPACT IDENTIFICATION AND ASSESSMENT .....</b>                        | <b>166</b> |
| 6.1. Impact Characterization and Evaluation.....                                    | 166        |
| 6.2. Potential Positive Environmental and social Impacts .....                      | 170        |
| 6.2.1. Economic and Employment Benefits .....                                       | 170        |
| 6.2.2. Institutional and Governance Strengthening .....                             | 171        |
| 6.2.3. Urban Infrastructure and Environmental Sustainability .....                  | 171        |
| 6.2.4. Social and Community-Level Benefits.....                                     | 172        |
| 6.2.5. Long-Term Strategic Benefits.....                                            | 174        |
| 6.3. Potential Negative Environmental and Social Impacts.....                       | 174        |
| 6.3.1. Negative Impacts during the Demolition Phase .....                           | 174        |
| 6.3.2. Negative Impact during Construction Phase .....                              | 180        |
| 6.3.3. Negative Impacts during the Operation Phase .....                            | 191        |
| 6.3.4. Residual Environmental and Social Impacts .....                              | 197        |
| <b>CHAPTER 7: ANALYSIS OF ALTERNATIVES.....</b>                                     | <b>200</b> |
| 7.1. No-Project Scenario .....                                                      | 200        |
| 7.2. Siting Alternative .....                                                       | 201        |
| 7.3. Reconstruction on Existing Site .....                                          | 201        |
| 7.4. Design Alternatives .....                                                      | 202        |
| 7.5. Technology Alternatives .....                                                  | 202        |
| 7.6. Construction Techniques and Phasing Alternatives .....                         | 202        |
| 7.7. Operation and Maintenance Alternatives Considered .....                        | 203        |
| 7.8. Waste Management Alternatives Considered.....                                  | 203        |
| 7.9. Energy Alternatives Considered .....                                           | 204        |
| 7.10. Conclusion .....                                                              | 205        |
| <b>CHAPTER 8: MITIGATION MEASURES FOR POTENTIAL IMPACTS .....</b>                   | <b>207</b> |
| 8.1. Positive Impact Maximization Strategies.....                                   | 207        |
| 8.2. Negative Impact Mitigation Measures.....                                       | 211        |
| 8.2.1. Demolition Phase Environmental and Social Impact Mitigation Measures .....   | 211        |
| 8.2.2. Construction Phase Environmental and social Impact Mitigation measures ..... | 214        |
| 8.2.3. Operation Phase Environmental and social Impact Mitigation measures .....    | 220        |
| 8.2.4. Operation phase: Residual Impacts Mitigation measures .....                  | 223        |

|                                                                             |            |
|-----------------------------------------------------------------------------|------------|
| <b>CHAPTER 9: GRIEVANCE REDRESS MECHANISM.....</b>                          | <b>229</b> |
| 9.1. Introduction .....                                                     | 229        |
| 9.2. Objectives of the GRM .....                                            | 229        |
| 9.3. Principles Guiding the GRM .....                                       | 229        |
| 9.4. Major Role of the Grievance Committee .....                            | 230        |
| 9.5. Role of the Grievance Mechanism .....                                  | 230        |
| 9.6. GRM Process Flow .....                                                 | 232        |
| 9.7. Potential Grievance Categories .....                                   | 234        |
| 9.8. Monitoring and Reporting .....                                         | 234        |
| 9.9. Grievance Register .....                                               | 234        |
| 9.10. Monthly Monitoring Reports .....                                      | 235        |
| 9.11. Continuous Improvement.....                                           | 237        |
| 9.12. Appeals and Legal Recourse .....                                      | 237        |
| <b>CHAPTER 10: ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN</b>  | <b>239</b> |
| 10.1. Introduction .....                                                    | 239        |
| 10.2. Purpose and Scope.....                                                | 240        |
| 10.3. The Scope of ESIA .....                                               | 240        |
| 10.4. Key Elements of the ESMP .....                                        | 242        |
| 10.5. Stakeholders in the implementation of ESMP .....                      | 242        |
| 10.5.1. Directorate of Environment and Climate Change (DECC) .....          | 242        |
| 10.5.2. Funder (African Development Bank - AfDB).....                       | 243        |
| 10.5.3. The Developer (Ministry of Finance - MoF) .....                     | 243        |
| 10.5.4. The Contractor .....                                                | 244        |
| 10.5.5. Project Implementation Unit (PIU) .....                             | 245        |
| 10.6. Capacity Building and Awareness Training.....                         | 245        |
| 10.7. Capacity Building and Training for Contractors' Employees .....       | 246        |
| 10.8. Environmental and Social Management and Monitoring Plan (ESMMP) ..... | 248        |
| <b>CHAPTER 11: CONCLUSIONS AND RECOMMENDATIONS .....</b>                    | <b>259</b> |
| 11.1. Conclusion .....                                                      | 259        |
| 11.2. Recommendations .....                                                 | 260        |
| <b>CHAPTER 12: REFERENCES .....</b>                                         | <b>263</b> |

|                                                                                       |     |
|---------------------------------------------------------------------------------------|-----|
| APPENDICES .....                                                                      | 265 |
| Appendix 1: Contractor's C-ESMP Contents.....                                         | 265 |
| Appendix 2: Grievance Resolution Forms, and Database (Log) Template .....             | 267 |
| Appendix 3: Environmental and Social Rules for Contractors .....                      | 274 |
| Appendix 4: Gender based Violence Prevention Plan .....                               | 278 |
| Appendix 5: Emergency Preparedness Plan (EPP) .....                                   | 280 |
| Appendix 6: Codes of Conduct.....                                                     | 283 |
| 1. CONTRACTOR'S CODE OF CONDUCT .....                                                 | 283 |
| 2. INDIVIDUAL WORKER'S CODE OF CONDUCT .....                                          | 285 |
| Appendix 7: Contractor Environmental and Social Policy Commitment.....                | 287 |
| Appendix 8: Minutes of Stakeholders Consultation .....                                | 291 |
| STAKEHOLDER MEETING 1: .....                                                          | 291 |
| Appendix 9: Environmental and Social Impacts Screening Checklist / Questionnaire..... | 302 |



## List of Tables

|                                                                                                    |     |
|----------------------------------------------------------------------------------------------------|-----|
| Table 1 :Structure of the report .....                                                             | 56  |
| Table 2 :Applicable AfDB Operational Safeguards (OS).....                                          | 95  |
| Table 3 :Institutional Framework for Environmental and Social Management in Somalia .....          | 99  |
| Table 4 :Key Institutions to the ESIA process .....                                                | 102 |
| Table 5 :Ambient Concentrations of Common Air Pollutants and WHO Thresholds (Mogadishu, 2025)..... | 117 |
| Table 6 : Environmental and Social Screening Checklist Form .....                                  | 136 |
| Table 7 : Stakeholder analysis matrix .....                                                        | 153 |
| Table 8 :Stakeholders consultation .....                                                           | 156 |
| Table 9 : Stakeholder Engagement Response Matrix.....                                              | 157 |
| Table 10 : Demolition Phase Risk Characterization .....                                            | 178 |
| Table 11 : Construction Phase risk characterization .....                                          | 188 |
| Table 12 : Operation Phase Risk Matrix.....                                                        | 195 |
| Table 13 : Residual Impacts.....                                                                   | 197 |
| Table 14 : Positive Impact enhancement strategy .....                                              | 208 |
| Table 15 : Demolition Phase Impact Mitigation Measures .....                                       | 211 |
| Table 16 : Construction Phase Impact Mitigation Measures .....                                     | 214 |
| Table 17 : Operation Phase Impact Mitigation Measures .....                                        | 220 |
| Table 18 : Residual Impact Mitigation Measures .....                                               | 223 |
| Table 19 :ESMMP .....                                                                              | 248 |
| Table 20 :Estimated ESMP implementation cost .....                                                 | 256 |

## List of Figures

|                                                                                                  |     |
|--------------------------------------------------------------------------------------------------|-----|
| Figure 1 : Project Location map .....                                                            | 58  |
| Figure 3 :Project Site Plan .....                                                                | 61  |
| Figure 4 :View of the Area likely to be potentially affected by the project Implementation ..... | 110 |
| Figure 5 : Project Location .....                                                                | 111 |
| Figure 6 : View of stagnant water on the ministry HQ compound.....                               | 114 |
| Figure 7 :Simulated 7-day trend of key pollutants in Mogadishu (Source: OpenAQ) .....            | 118 |
| Figure 8 : View of Vegetation around the project site .....                                      | 123 |
| Figure 9 : Engagement with Key stakeholders .....                                                | 160 |
| Figure 10 : Engagement with Women and Youth representatives .....                                | 161 |
| Figure 11 :Engagement with key MoF staff.....                                                    | 161 |

## **ABBREVIATIONS AND ACRONYMS**

|          |                                                       |
|----------|-------------------------------------------------------|
| AfDB     | African Development Bank                              |
| AfDB ISS | AfDB Integrated Safeguards System                     |
| AfDB OS  | AfDB Operational Safeguards                           |
| FGS      | Federal Government of Somalia                         |
| BMS      | Building Management System                            |
| BRA      | Banadir Regional Administration                       |
| CAE      | Child Abuse/Exploitation                              |
| C-ESMP   | Contractor's Environmental and Social Management Plan |
| CoC      | Codes of Conduct                                      |
| ESAP     | Environmental and Social Action Plan                  |
| ESIA     | Environmental and Social Impact Assessment            |
| ESMP     | Environmental and Social Management Plan              |
| ERP      | Emergency Response Plan                               |
| NTP      | National Transformation Plan                          |
| FGS      | Federal Government of Somalia                         |
| GBV      | Gender Based Violence                                 |
| GRC      | Grievance Redress Committee                           |
| GRM      | Grievance Redress Mechanism                           |
| HEPA     | High Efficiency Particulate Air                       |
| HR       | Human Resource                                        |
| HVAC     | Heating, Ventilation, and Air-conditioning            |

|      |                                               |
|------|-----------------------------------------------|
| IEC  | Information Education and communication       |
| PAPS | Project Affected Persons                      |
| PPE  | Personal Protective Equipment                 |
| SEA  | Sexual Exploitation and Abuse                 |
| VAC  | Violence Against Children                     |
| ESIS | Environmental and Social Study                |
| DECC | Directorate of Environment and Climate Change |
| MoF  | Ministry of Finance                           |
| NGO  | Non-Governmental Organization                 |
| OHS  | Occupational Health and Safety                |
| OS   | Operational Safeguard                         |
| EHS  | Environmental health and safety               |
| PIU  | Project Implementation Unit                   |
| PIE  | Project Implementation Entity                 |
| RAP  | Resettlement Action Plan                      |
| PAP  | Project Affected Persons                      |
| WASH | Water, Sanitation and Hygiene                 |

## EXECUTIVE SUMMARY

### A. OVERVIEW

The Ministry of Finance (MoF) of the Federal Government of Somalia (FGS) is undertaking a high-priority infrastructure redevelopment project to address urgent safety concerns and restore institutional functionality. The existing six-storey Ministry building, located in central Mogadishu, has deteriorated to a dangerous condition due to years of structural neglect, poor maintenance and age-related degradation. A professional structural integrity assessment confirmed extensive damage, including collapsed ceilings, cracked concrete, corroded reinforcement bars, water seepage and faulty electrical wiring, rendering the facility unfit for occupation. Following these findings, the building was evacuated to safeguard staff and the public, and the Ministry initiated planning for demolition and reconstruction. Recognizing the critical nature of this intervention, the Ministry has officially requested financial support from the African Development Bank (AfDB) to implement the project in full compliance with environmental, social and safety safeguards.

The proposed project involves two major components: the safe demolition of the existing structure and the construction of a new eight-storey Ministry headquarters on the same site. The new facility is designed to serve as a secure, functional and modern administrative complex that supports the Ministry's executive, operational and public-facing responsibilities. Key features will include climate-resilient building materials, energy-efficient utilities, advanced ICT infrastructure, emergency and fire safety systems and universal accessibility. The project also aligns with broader national goals under Somalia's National Transformation Plan (NTP 2025-2029), which emphasizes resilient infrastructure as a foundation for sustainable governance, economic growth and public service delivery. It further supports the achievement of several Sustainable Development Goals (SDGs), particularly Goals 9, 11, and 16.

The demolition and reconstruction will be guided by a detailed Environmental and Social Impact Assessment (ESIA) and an accompanying Environmental and Social

Management Plan (ESMP), developed in alignment with Somalia's Environmental Management Act (2020), the National Environmental Policy (2019), and AfDB's Integrated Safeguards System. These instruments identify and propose mitigation for potential risks, such as air and noise pollution, waste generation, worker and community safety concerns and traffic disruption, while ensuring compliance with Good International Industry Practice (GIIP). The Ministry has already conducted stakeholder consultations with neighboring institutions, local authorities, and staff representatives to ensure transparency, inclusivity, and conflict-sensitive planning throughout the project lifecycle. To ensure compliance with AfDB Safeguard Policies, Somali national environmental laws and Good International Industry Practices (GIIP), a site-specific Environmental and Social Impact Assessment (ESIA) has been conducted. This ESIA supports the broader environmental management framework and culminates in the preparation of an Environmental and Social Management Plan (ESMP).

### **Objective of the ESIA**

The primary objective of the Environmental and Social Impact Assessment (ESIA) is to systematically identify, assess, and mitigate potential adverse environmental and social impacts arising from the demolition of the existing Ministry of Finance building and the construction of its replacement. This process ensures full compliance with the African Development Bank (AfDB) Safeguard Policies, which prioritize sustainable development, as well as Somali national laws and policies, including Article 25 of the Constitution (guaranteeing the right to a clean and healthy environment) and the National Environment Policy (2019). The assessment will also align with Good International Industry Practices (GIIP), fostering accountability and transparency throughout the project lifecycle, while reinforcing positive impacts and promoting sustainable benefits for surrounding communities.

## **Specific Objectives of the ESIA**

- To assess the anticipated environmental and social effects of the project, both in the near term and long run and to gauge the scale and significance of these effects in relation to the local context.
- To recommend site-specific strategies that will help avoid, reduce, or offset negative impacts while enhancing the project's potential benefits for the environment and nearby communities.
- To embed environmental and social responsibility into the project's planning and decision-making structures, ensuring that sustainability principles guide every phase of implementation.
- To promote an approach that balances development with environmental protection and social equity, by ensuring that the project upholds high standards of environmental stewardship and community welfare.
- To design a detailed Environmental and Social Management Plan (ESMP) that outlines the key measures, timelines and oversight mechanisms needed to manage identified risks and impacts effectively.
- To equip project teams and decision-makers with a clear environmental and social risk assessment tool, which enables early identification of issues and supports informed choices throughout project execution.
- To outline roles, responsibilities, and communication pathways among all involved stakeholders to ensure efficient coordination, accountability, and transparency in managing environmental and social safeguards.
- To estimate the resources required, financial, human and technical for ESMP implementation, and to ensure that these are built into the project's budgeting and operational frameworks.

- To identify gaps in knowledge, skills, and institutional capacity related to environmental and social safeguards, and to recommend targeted training and support that will empower stakeholders to uphold ESMP commitments.

Key focus areas of the Environmental and Social Impact Assessment (ESIA) include the delineation of institutional responsibilities, identification and analysis of environmental and social (E&S) impacts, formulation of mitigation and monitoring measures and establishment of a functional grievance redress mechanism (GRM). The ESIA also places strong emphasis on cross cutting issues such as gender equality, prevention and response to gender-based violence (GBV), inclusion of vulnerable and marginalized groups (VMGs), occupational and community health and safety risks as well as the capacity building of key stakeholders to implement and monitor safeguards effectively.

## **B. PROJECT DESCRIPTION**

### **Project Goal**

The goal of the project is to construct a new eight-storey building for the Ministry of Finance (MoF) of the Federal Government of Somalia (FGS) to replace the structurally unsafe existing building, ensuring a secure, efficient, and dignified workspace for staff and visitors while complying with environmental, social, and safety standards.

### **Project-specific objectives**

The specific objectives of the project are:

- To eliminate structural hazards and occupational risks posed by the current MoF building, thereby protecting the health and safety of staff and visitors;
- To provide a fit-for-purpose working environment that facilitates efficient execution of the Ministry's core functions in budget preparation, public finance management, procurement oversight, and resource mobilization;



- To incorporate sustainable building technologies and design features that reduce the facility's environmental footprint and operational costs;
- To strengthen institutional visibility, government credibility, and public trust by investing in high-quality public infrastructure;
- To integrate gender-responsive and inclusive design features that ensure accessibility and equitable service delivery.

## **Project Location**

The proposed Ministry of Finance (MoF) headquarters project is located at latitude 2.04000° N and longitude 45.34611° E (2°02'24" N, 45°20'46" E), within Mogadishu's central administrative zone in the Banadir Regional Administration. It lies directly opposite the Central Bank of Somalia (CBS) and is surrounded by high-profile institutions such as other ministries, government agencies, and commercial buildings. The site's centrality within Mogadishu's governance and financial district makes it both strategically vital and environmentally sensitive. High pedestrian and vehicular traffic volumes necessitate strict environmental, health, and safety controls during demolition and construction phases to prevent disruption and safeguard public health.

## **General Site Layout, Size, Capacity & Functional Allocation**

The project entails demolishing the current six-storey MoF building to pave the way for a modern eight-storey structure occupying a rectangular 1,244 m<sup>2</sup> plot (55.8 m x 22.3 m), strategically sited at the junction of Corso Somalia Road and Via Ahmed Bin Idriss. The design will prioritize functional zoning and security, including controlled access points, a secure sally port, and ballistic-rated construction features.

The ground floor will host public-facing amenities such as a reception area, visitor lounges, bistro, an internal courtyard and collaborative project hubs. The upper floors will house departmental and executive offices, flexible program zones and four high-level executive suites equipped with lounges, kitchenettes and private prayer rooms. The planned built-up area is approximately 6,800 m<sup>2</sup> across eight levels, including a basement for parking. The building will accommodate 270–300 personnel and over 50 daily visitors, with boardrooms and breakout spaces integrated throughout. Construction will proceed in phases, beginning with the demolition of the existing structure and boundary walls and culminating in a facility that meets both operational and strategic objectives.

## **Project Components**

- i. **Executive Accommodation:** Provision of five executive suites, each comprising spacious offices, secretarial support areas with work pools, private lounges, kitchenette facilities, ensuite washrooms and dedicated prayer rooms. These suites will support five high-ranking Ministry executives.
- ii. **Privacy and Security Zoning:** Clear spatial graduation from public to private zones, with executive areas receiving premium levels of security. Features will include safe rooms, ballistic-rated construction elements, electronic access control and integrated surveillance systems.
- iii. **Departmental Offices:** Adequate workspaces for all Ministry departments, including open- plan work pools, managerial suites, and support areas, maintaining continuity with the current organizational structure.
- iv. **Meeting and Conference Facilities:** Allocation of at least two formal conference rooms, designed for high-level meetings and official engagements.
- v. **Public Interface:** Ample public lounges and informal breakout spaces to accommodate visitors and foster a welcoming, civic atmosphere.
- vi. **Project-based Accommodation:** Flexible office spaces intended to host temporary teams working on ongoing government programmes or inter-ministerial projects.
- v. **Public Amenities:** Sufficient public spaces for visitors.

## **Project Phases**

The proposed redevelopment of the Ministry of Finance (MoF) headquarters will be executed in three key phases.

### **i. Pre-Construction**

This initial phase encompasses planning, design finalization, regulatory approvals including ESIA clearance, and preliminary site investigations such as geotechnical and topographical surveys. It includes disconnection of utilities (electricity, water, sewer, and communication lines), mobilization of contractors and equipment, and securing the site with fencing, signage, and safety controls.

### **ii. Construction Phase**

Divided into two sub-phases:

**Demolition Sub-Phase:** Involves the safe mechanical demolition of the structurally compromised six-storey building. Debris will be removed and disposed of or recycled at authorized facilities. Key safeguards include dust suppression, noise control, PPE compliance, and traffic management. Any hazardous materials encountered will be managed according to national standards.

**Construction Sub-Phase:** Begins with excavation and foundation works, followed by construction of the new eight-storey facility. This includes structural framing, internal systems (electrical, plumbing, HVAC), fire and security installations, ICT infrastructure and finishes. External works like drainage, access roads, parking, and landscaping will be completed. Environmental and social safeguards will be monitored continuously.

### **iii. Post-Construction and Operational Phase**

Following completion, the building will undergo system testing and commissioning to ensure functional integrity. Temporary facilities will be removed, and the site will be

handed over to the MoF. The facility, designed to accommodate 300–350 staff, will offer secure, modern workspaces and public service functions. Regular maintenance and long-term environmental and social monitoring will begin at this stage to ensure continued compliance and sustainability.

## **Methodology for Conducting ESIA**

The assessment utilized a participatory and consultative approach, incorporating desk reviews, site investigations, baseline data collection, stakeholder consultations, and expert analysis. Key stakeholders, including municipal authorities, neighboring institutions, community members, and MoF staff, were consulted through meetings and interviews.

## **C. BASELINE CONDITION**

### **Environmental Baseline Information**

**Ambient Air Quality:** Baseline air quality measurements according to IQAir (2024) and OpenAQ, PM<sub>2.5</sub> in Mogadishu indicate that concentrations of key pollutants PM<sub>2.5</sub> (22 µg/m<sup>3</sup>) and PM<sub>10</sub> (36 µg/m<sup>3</sup>) are within permissible limits set by the World Health Organization (WHO) for urban settings. However, the potential for dust emissions during demolition and construction requires mitigation through dust suppression and air quality monitoring.

**Noise Levels:** Ambient noise levels in the vicinity average 67 dB(A) during daytime and 59 dB(A) at night, primarily attributed to urban road traffic, commercial activity and informal vending. These exceed WHO recommended limits for residential areas (55 dB daytime, 45 dB nighttime), suggesting a sensitive noise environment that could be worsened by project activities if not managed effectively.

**Water Supply:** The site is served by the Mogadishu Water Supply Company. With increased building capacity, water demand is expected to rise significantly, requiring assurance of supply reliability during and after construction.

**Sanitation and Wastewater:** The Ministry currently discharges into the municipal sewer line. However, the new building's increased capacity necessitates assessment and potential upgrading of connections and on-site systems to avoid overloading and protect soil and groundwater quality.

**Fauna and Flora:** The project site in Mogadishu has limited vegetation, mostly drought-resistant plants and a few scattered trees due to urbanization. Faunal diversity is low, with mostly common urban birds like sparrows, doves and crows, along with insects and rodents. No rare or sensitive species are present. Construction impact on flora and fauna is expected to be minimal, but measures to protect bird nests and enhance urban biodiversity are recommended.

### **Climate and Meteorological Conditions:**

**Temperature:** Mogadishu has a hot, semi-arid climate (Köppen classification BSh). The average annual temperature is approximately 27.8°C, with monthly averages ranging from 25°C (coolest months) to 32°C (hottest months) (World Bank Climate Data, 2024).

**Rainfall:** The city receives an average of 430–500 mm of rainfall annually, occurring mainly during two short wet seasons, Gu (April–June) and Dayr (October–November). Rainfall events are often intense but short-lived, increasing the risk of flash floods if drainage infrastructure is inadequate.

### **Socio-economic baseline information**

**Economic Importance of Mogadishu-**Mogadishu serves as Somalia's economic nerve center, with rapid reconstruction driven by domestic enterprise, diaspora investments, and a strong humanitarian presence.

**Trade and Commerce-** Trade is the dominant economic activity. The city hosts major markets like Bakara and benefits from high-volume imports via the Port of Mogadishu. Both formal retail and informal vending flourish, supported by widespread use of mobile money platforms such as EVC Plus.

**Fishing and Marine Livelihoods-** Mogadishu's coastal location supports artisanal fishing. Despite rich marine resources, the sector is underdeveloped due to limited infrastructure and market access.

**Transport and Mobility-** The city's informal transport system, comprising taxis, minibuses, and bajajs, facilitates economic movement. However, traffic congestion is common in central zones, including the MoF vicinity.

**Construction and Real Estate Development-** There is a sustained construction boom, particularly in residential and institutional projects. This sector is a major employer but is challenged by weak enforcement of building regulations.

**Employment and Informal Economy-** Youth unemployment stands at 30.1%, with overall national unemployment at 21.7%. Many residents rely on informal jobs such as street vending and motorcycle taxi operations to survive.

**Women's Economic Participation-** Women own approximately 45% of micro-enterprises in Mogadishu but face barriers such as lack of access to finance, restrictive credit systems, and social constraints.

**Remittances and Aid Dependence-** Remittances contribute 23–30% of Somalia's GDP. Humanitarian aid remains vital, especially for IDPs and vulnerable urban households.

**Education Levels-** Adult literacy is around 41%, with a gender gap—54% for men and 22% for women. Only 15–16% of children complete primary school due to poverty, insecurity, and weak infrastructure.

**Healthcare Access-** Health services are delivered through a mix of public, private, and NGO-run facilities. Mobile health units serve IDPs and underserved neighborhoods.

**Water and Sanitation-** Access to improved water sources ranges from 75%–78%, though sanitation infrastructure remains poor, particularly in informal settlements and IDP camps.

**Religious and Community Structures-** Islam is the dominant religion. Mosques and madrassas play key roles in community cohesion, social services, and public education initiatives.

**Population and Demographics-** With an estimated population of 2.4 million, Mogadishu is Somalia's largest city. Around 70% of the population is under 30, and households are large and multigenerational.

**Urban Growth and Land Tenure-** Real estate expansion, largely driven by diaspora investment, has led to land disputes and unplanned developments. Weak urban governance contributes to tenure insecurity.

**Land Use and Land Cover-** The Proposed MoF project site is located in a central urbanized zone dominated by government offices, administrative buildings, and paved road networks. The site is mostly covered by impervious surfaces such as tarmac and concrete, with minimal vegetation and limited green or recreational spaces.

#### **D. STAKEHOLDER CONSULTATIONS**

A public consultation and stakeholder engagement workshop was held on 11th May 2025 at the Ministry of Finance (MoF) Headquarters in Mogadishu as part of the Environmental and Social Impact Assessment (ESIA) process for the proposed demolition and reconstruction of the MoF facility. The workshop brought together over 14 key stakeholders, including representatives from nearby communities, government ministries, the Directorate of Environment, financial institutions, NGOs, civil society groups, CBOs, and vulnerable and marginalized groups (VMGs). Overall, participants expressed strong support for the project, recognizing the redevelopment as timely and beneficial. The Directorate of Environment also endorsed the project and pledged support for its successful implementation.

Stakeholders raised important concerns such as the need for strong coordination in implementing environmental safeguards, the establishment of a robust and functional



Grievance Redress Mechanism (GRM), and the inclusion of local communities in project information dissemination. Representatives of women's and marginalized groups voiced support and expressed interest in continued engagement. In response, the MoF committed to implementing mitigation measures, including community-inclusive hiring (with at least 60% local unskilled labour), dust and noise control, traffic and safety management, and continuous public communication through a dedicated Public Information Officer. These inputs were integrated into the ESMP to promote accountability, transparency, and inclusive development.

## **E. INSTITUTIONAL AND LEGAL FRAMEWORK**

The Ministry of Finance (MoF) building reconstruction project in Mogadishu is guided by a strong institutional, legal, and regulatory framework to ensure environmental and social sustainability.

### **National Legal and Policy Framework**

#### **National Laws**

- Constitution (2012): Guarantees a clean environment (Article 25) and sustainable development (Article 45).
- Environmental Protection & Management Act (2024): Requires ESIA, public consultations, and an approved ESMP.

#### **Key Policies**

- National Environmental Policy: Mandates EIAs for high-impact projects.
- Climate Change Policy: Ensures climate-resilient construction.

#### **International Commitments**

Somalia is a signatory to key international conventions such as the UNFCCC, UNCCD, CITES, CBD, and ILO Conventions, ensuring that environmental protection, climate resilience, biodiversity, and labour rights are upheld throughout project implementation.

### **AfDB Safeguards Compliance**

Funded by the African Development Bank (AfDB), the project is classified as Category 2, requiring a full Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP). Four AfDB Operational Safeguards (OS1, OS3, OS4, OS5) are triggered, covering environmental assessment, pollution control, biodiversity, and labour safety.

### **Institutional Responsibilities**

- MoF is the Project Implementation Entity (PIE), responsible for coordination and compliance.
- MoECC leads environmental oversight, approvals, and monitoring.
- MoLSA and DOSH enforce labour standards and workplace safety.
- Banadir Regional Administration ensures local compliance, waste management, and stakeholder engagement.
- Somali Police and Mogadishu City Administration provide site security and urban regulatory support.

## **F. ANALYSIS OF ALTERNATIVES**

This section analyzes alternatives for the proposed demolition and reconstruction of the Ministry of Finance (MoF) Headquarters. The options considered included: (1) the No Project scenario, which was dismissed due to safety and operational limitations; (2) Relocation to a new site, rejected due to high costs, displacement risks, and security

concerns; (3) Reconstruction on the existing site, selected for service continuity and minimized disruption; (4) Design alternatives, where a mid-rise (8-storey - comprising a basement, ground floor and six floors above ground level, plus a service level) structure was preferred over low- and high-rise options; (5) Technology alternatives, where reinforced concrete was chosen over prefabricated steel for durability and local suitability; (6) Construction phasing, with full demolition preferred over phased construction for safety and efficiency; (7) Operation and maintenance alternatives, favoring smart systems over traditional infrastructure; (8) Waste management alternatives, where integrated reduction, reuse, and recycling was chosen over conventional disposal; and (9) Energy alternatives, where a hybrid solar-grid system was selected for reliability and sustainability.

Reconstruction on the existing site was ultimately chosen as the most viable option, offering a secure, cost-effective, and future-ready solution aligned with the project's technical, economic, environmental, and institutional objectives.

## **G. ESIA IMPACTS ASSESSMENT AND MITIGATION STRATEGIES**

### **Positive Impacts**

- **Employment Creation:** Over 150 direct jobs and 100-plus indirect jobs will be generated across all project phases, with at least 60% of unskilled labour sourced locally
- **Economic Stimulation:** Local businesses will benefit from increased demand for goods and services, injecting income into the urban economy
- **Institutional Efficiency:** Co-location of departments and digital systems will enhance public service delivery, reduce delays and improve transparency in financial management

- **Green Infrastructure:** The building will feature solar panels covering up to 25% of energy needs water water-saving systems and native landscaping to support climate resilience
- **Urban Renewal:** The project replaces a deteriorated structure with a modern, accessible and safe facility, enhancing city aesthetics and functionality
- **Social Inclusion:** Gender sensitive hiring, youth training and accessible design will promote equity and inclusive development
- **Resilience and Cost Savings:** The facility is climate and security resilient and is expected to reduce long-term energy and operational costs by up to 20%.

## Negative impacts during demolition and construction phase

The table below presents a summary of ESIA's potential negative Impacts and Mitigation Measures

| Impacts                                                            | Mitigation Measures                                                                                    |
|--------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| <b>DEMOLITION PHASE</b>                                            |                                                                                                        |
| Significant dust emissions (PM <sub>10</sub> & PM <sub>2.5</sub> ) | Use water spraying, dust nets/screens; limit work during windy days; mandatory PPE for workers         |
| Elevated noise and vibrations                                      | Install temporary noise barriers; restrict activities to daytime hours; provide hearing protection     |
| Solid waste generation (concrete, metal, wood)                     | Sort and recycle waste; dispose of via licensed firms; prohibit open dumping or burning                |
| Exposure to hazardous materials (asbestos, lead)                   | Conduct hazardous materials audit; use certified removal services and PPE; follow disposal regulations |
| Water pollution from runoff                                        | Use silt traps; protect drains; store hazardous substances in bunded areas                             |
| Soil compaction and contamination                                  | Designate machinery paths; use ground protection mats; remediate affected soils                        |
| Occupational health and safety risks                               | Provide safety gear, train workers and conduct safety drills and inspections                           |
| Security risks (theft, intrusion, vandalism)                       | Secure perimeter fencing; install lighting and CCTV; maintain on-site security personnel               |
| Disruption to access routes                                        | Install directional signage; liaise with traffic police; provide alternative paths                     |
| Greenhouse gas emissions                                           | Use low-emission machinery; limit idling; encourage shared transport for workers                       |
| <b>CONSTRUCTION PHASE</b>                                          |                                                                                                        |
| Loss of vegetation                                                 | Minimize clearance area; replant with native species post-construction                                 |
| Air pollution from dust and diesel                                 | Regular spraying and maintenance, enforce vehicle emission standards                                   |
| Noise and vibrations from machinery                                | Set noise thresholds, monitor vibrations and communicate the schedule to neighbors                     |

| Impacts                                      | Mitigation Measures                                                                                     |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Water pollution from chemical spills         | Store chemicals in secure areas; install containment bunds; ensure emergency cleanup kits are available |
| Pressure on local infrastructure             | Coordinate with utility providers; stagger usage of high-load equipment                                 |
| Soil degradation (erosion, compaction)       | Implement erosion controls (silt fences, vegetation); restrict heavy machinery movement                 |
| Construction waste generation                | Minimize packaging; reuse materials; establish on-site waste segregation points                         |
| Liquid waste (equipment washing, sanitation) | Install portable toilets; treat greywater before disposal                                               |
| Socio-cultural disruptions from labor influx | Prioritize local hiring; orient workers on local customs; establish a labor code of conduct             |
| Occupational health hazards                  | Enforce safety protocols; provide adequate PPE; conduct regular health checks                           |
| Community health & safety risks              | Fence off-site; use traffic marshals; communicate risks to the community                                |
| Greenhouse gas emissions                     | Choose efficient equipment; use green materials where possible; track emissions                         |
| Risk of GBV                                  | Sensitize staff; set up grievance mechanisms; partner with local GBV services                           |
| Risk of child labor                          | Enforce strict hiring practices; conduct ID checks and spot inspections                                 |
| Risk of HIV/STI transmission                 | Provide awareness, testing, and prevention services; distribute condoms on-site                         |
| <b>OPERATION PHASE</b>                       |                                                                                                         |
| Increased water and electricity demand       | Install water-saving devices and solar panels; use energy-efficient appliances                          |
| Waste generation (office waste, e-waste)     | Implement waste separation and recycling programs; safely dispose of e-waste                            |
| Indoor air quality concerns                  | Ensure proper HVAC systems; install air filters; conduct regular maintenance                            |
| Risk of fire and electrical hazards          | Install fire alarms, extinguishers, and safe wiring; conduct fire drills and safety audits              |

| Impacts                                    | Mitigation Measures                                                                   |
|--------------------------------------------|---------------------------------------------------------------------------------------|
| Increased traffic to and from the facility | Develop a traffic management plan; encourage public and non-motorized transport       |
| Community safety and access issues         | Provide well-lit pathways; ensure universal accessibility; maintain clear signage     |
| Employment inequality or exclusion         | Enforce inclusive hiring; offer internships for youth, women, and PWDs                |
| Gender or disability discrimination        | Implement inclusive workplace policies; maintain accessible infrastructure            |
| Long-term operational emissions            | Maximize renewable energy use; monitor and report emissions regularly                 |
| Public dissatisfaction or mistrust         | Maintain transparent operations; engage in public communication and feedback sessions |

## H. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

### Risks Management Measures

Environmental and Social Risks and Corresponding Mitigation Measures:

#### 1. Air Pollution (Dust and Emissions):

Regular water spraying, covering of debris, use of low-emission machinery.

Monitoring of ambient air quality during demolition and construction.

#### 2. Noise and Vibrations:

Restrict noisy activities to daylight hours, use noise barriers, and perform routine equipment maintenance.

#### 3. Soil and Water Contamination:

Install spill containment basins; avoid fuel/oil storage near drains; conduct soil and water testing.

4. Waste Generation (Solid, Liquid, and Hazardous):

Segregate and store solid waste, engage licensed haulers and implement asbestos-safe removal practices if any .

5. Occupational Health and Safety (OHS):

Daily safety briefings, provision of PPE and enforcement of safety signage and emergency protocols.

6. Community Health and Safety:

Secure the site perimeter, provide traffic control measures and conduct community awareness sessions.

7. Biodiversity and Vegetation Loss:

Implement replanting and landscaping with native species after major earthworks.

8. Social Risks (GBV, HIV/STI, labour Influx):

Enforce Code of Conduct, provide HIV awareness training and establish GBV reporting hotlines.

9. Security and Intrusion Risks:

24/7 site security, fencing, access control and collaboration with law enforcement agencies.

**Environmental and Occupational Health & Safety (EOHS) Clauses in Works Contracts:**



Contracts for all contractors will include enforceable clauses covering:

- (i) General rules for hygiene, health, and safety on construction sites.
- (ii) Mandatory HIV/AIDS and STI awareness training and provision of condoms.
- (iii) Community-worker interaction protocols emphasizing the protection of minors and vulnerable persons.
- (iv) Gender equity, GBV prevention, and response to sexual exploitation and abuse (SEA).
- (v) Chance finds a procedure for managing culturally or archaeologically significant discoveries.

**Capacity Building Measures:**

MoF funded training on Environmental and Social Safeguards (ISS), GBV prevention, emergency response and grievance redress mechanisms for contractors, site supervisors, and community leaders.

### **Resettlement Action Plan (RAP):**

Not applicable. The project will not lead to physical or economic displacement or loss of access to livelihoods. No resettlement required.

### **Key ESMP Implementation Indicators**

- Percentage of waste managed through licensed handlers (target: 100%)
- Number of H&S trainings conducted and workers trained (target:  $\geq 4$  sessions per phase)
- Number of GBV awareness sessions conducted (target:  $\geq 2$  per phase)
- Air, water, and noise monitoring compliance (target: 100% as per schedule)
- Number of community grievances addressed through GRM (target: all within 14 days)

## **Institutional Roles and Responsibilities for ESMP Implementation**

The effective implementation of the Environmental and Social Management and Monitoring Plan (ESMMP) will be anchored within a well-defined institutional framework led by the Project Implementation Entity (PIE) through a Project Implementation Unit (PIU) established under the Ministry of Finance. The PIU serves as the central coordination body, tasked with the day-to-day management, compliance monitoring, stakeholder engagement, and reporting of all environmental and social safeguards.

The PIU will work in collaboration with permanent institutions, including:

- The Directorate of Environment and Climate Change (DECC), ensures regulatory compliance and environmental oversight.
- The African Development Bank (AfDB), provides technical supervision aligned with its safeguards policies.
- The Ministry of Finance (MoF), leads project development and ensures adherence to ESMP commitments.

In addition, a temporary multi-stakeholder Grievance Redress Committee will be constituted to manage complaints and conflicts arising during implementation.

## Environmental and Social Management and Monitoring Plan Matrix

| Code   | Impact                   | Mitigation/Enhancement Measures                                                     | Deadline for Completion                  | Key Performance Indicator                            | Implementation Responsibility | Monitoring / Oversight       |
|--------|--------------------------|-------------------------------------------------------------------------------------|------------------------------------------|------------------------------------------------------|-------------------------------|------------------------------|
| IMP-01 | Air Pollution (Dust)     | Water spraying, cover debris, quick waste removal, use of PPE                       | Daily during demolition and construction | Dust suppression logs, AQI reports                   | Contractor, PIU               | ESMP Consultant, PIU         |
| IMP-02 | Noise and Vibration      | Schedule noisy work, use noise barriers, restrict work hours and maintain equipment | Throughout demolition and construction   | Noise/vibration log, complaint records               | Contractor                    | PIU, Local Environment Dept. |
| IMP-03 | Solid Waste Generation   | Waste segregation, use of licensed haulers and covered onsite storage               | Weekly throughout the project life cycle | Waste disposal logs, visual inspections              | Contractor, Municipality      | PIU, Sanitation Dept.        |
| IMP-04 | Hazardous Waste Exposure | Licensed hazardous waste removal, sealed PPE, worker training                       | Start of demolition as needed            | Hazardous waste manifests, exposure incident reports | Contractor (licensed), PIU    | MoF Safeguards Unit, PIU     |

| Code   | Impact                              | Mitigation/Enhancement Measures                                 | Deadline for Completion                 | Key Performance Indicator               | Implementation Responsibility         | Monitoring / Oversight   |
|--------|-------------------------------------|-----------------------------------------------------------------|-----------------------------------------|-----------------------------------------|---------------------------------------|--------------------------|
| IMP-05 | Water Pollution (Demolition Runoff) | Install barriers, stormwater channels, avoid work in wet season | Continuous during demolition            | Water quality tests, drainage checks    | Contractor, Municipal Sanitation Dept | PIU                      |
| IMP-06 | Soil Degradation/ Contamination     | Leak-proof fuel storage, spill kits and containment platforms   | Weekly during demolition & construction | Spill incident logs                     | Contractor                            | ESMP Team                |
| IMP-07 | Occupational Health & Safety Risks  | Safety induction, PPE, daily toolbox meetings, safety signage   | Daily throughout project                | H&S incident reports, PPE compliance    | Contractor, H&S Officer               | PIU, H&S Expert          |
| IMP-08 | Site Security Threats               | Fencing, security guards, lighting, 24/7 surveillance           | Continuous                              | Security log, breach reports            | Contractor, MoF Security              | PIU, Security Department |
| IMP-09 | Community Disturbance               | Notice boards, detour signs and community liaison officer       | Daily throughout work                   | Number of community complaints resolved | Contractor, Local Authorities         | PIU                      |

| Code   | Impact                           | Mitigation/Enhancement Measures                                        | Deadline for Completion             | Key Performance Indicator                   | Implementation Responsibility | Monitoring / Oversight       |
|--------|----------------------------------|------------------------------------------------------------------------|-------------------------------------|---------------------------------------------|-------------------------------|------------------------------|
| IMP-10 | Greenhouse Gas Emissions         | Use efficient equipment, track fuel use and consider offsets           | Monthly throughout construction     | Fuel logs, GHG estimates                    | Contractor, ESMP Consultant   | PIU                          |
| IMP-11 | Loss of Vegetation               | Replanting program, native species landscaping                         | After the completion of civil works | Vegetation cover index                      | Contractor, MoE               | PIU Environmental Specialist |
| IMP-12 | Pressure on Utilities            | Coordinate with utility providers, stagger material deliveries         | Weekly during construction          | Complaints from utility companies           | Contractor, Municipality      | PIU                          |
| IMP-13 | Soil Compaction                  | Use predefined paths, de-compact post-construction, erosion control    | Weekly during construction          | Site inspection reports                     | Contractor                    | ESMP Consultant              |
| IMP-14 | Liquid Waste Generation          | Provide mobile toilets, greywater management, and oil-water separators | Weekly during construction          | Wastewater test results, visual assessments | Contractor                    | PIU                          |
| IMP-15 | Labour Influx/Community Tensions | Code of conduct, local hiring and community engagement meetings        | Pre-construction ongoing            | Grievance records, reports on incidents     | Contractor, PIU               | Local Administration         |

| Code   | Impact                         | Mitigation/Enhancement Measures                                                  | Deadline for Completion           | Key Performance Indicator            | Implementation Responsibility | Monitoring / Oversight           |
|--------|--------------------------------|----------------------------------------------------------------------------------|-----------------------------------|--------------------------------------|-------------------------------|----------------------------------|
| IMP-16 | GBV and SEA Risks              | GBV Action Plan, worker sensitization, hotline deployment, zero tolerance policy | Prior to works + ongoing          | GBV case logs, training attendance   | Contractor, PIU               | GBV Focal Point, Safeguards Unit |
| IMP-17 | Risk of Child labour           | Age verification, site access control, labour policy enforcement                 | Pre-construction and daily checks | Staff age records, site audit logs   | Contractor                    | PIU, labour Office               |
| IMP-18 | HIV/STI Transmission Risk      | Conduct awareness, health outreach, distribute condoms                           | Monthly outreach during project   | Number reached, STI clinic referrals | PIU, MoH Partner              | Health Officer                   |
| IMP-19 | Emergency, GBV & GRM Awareness | Community sensitization, hotline visibility, IEC materials                       | Start-up + Ongoing                | Community session reports            | PIU, CDO                      | GRM Committee                    |
| IMP-20 | Capacity Building (Safeguards) | Training for contractors and supervisors on AfDB ISS and GBV risk management     | Prior to site mobilization        | Training records, test scores        | PIU                           | MoF Capacity Fund Facilitator    |

### Estimated overall budget for the implementation of all environmental and social measures

| Category   | Activity                                                      | Unit     | Quantity | Unit Cost (USD) | Total Cost (USD) | Source of Fund              |
|------------|---------------------------------------------------------------|----------|----------|-----------------|------------------|-----------------------------|
| Mitigation | Dust suppression (water spraying)                             | Month    | 12       | 1,500           | 18,000           | Contractors approved budget |
|            | Noise reduction (acoustic barriers, equipment mufflers)       | Lump Sum | 1        | 20,000          | 20,000           | Contractors approved budget |
|            | Proper debris handling & hazardous waste disposal             | Lump Sum | 1        | 25,000          | 25,000           | Contractors approved budget |
|            | Soil erosion/sediment control                                 | Lump Sum | 1        | 10,000          | 10,000           | Contractors approved budget |
|            | Air quality protection and (covering trucks, dust nets, etc.) | Lump Sum | 1        | 8,000           | 8,000            | Contractors approved budget |
|            | Temporary sanitation facilities for workers                   | Month    | 12       | 1,200           | 14,400           | Contractors approved budget |



| Category          | Activity                                                       | Unit      | Quantity | Unit Cost (USD) | Total Cost (USD) | Source of Fund                            |
|-------------------|----------------------------------------------------------------|-----------|----------|-----------------|------------------|-------------------------------------------|
| Monitoring        | Environmental monitoring<br>(air, water, noise, soil)          | Quarter   | 4        | 5,000           | 20,000           | MoF                                       |
|                   | Social monitoring<br>(grievance redress,<br>labour conditions) | Quarter   | 4        | 3,000           | 12,000           | MoF                                       |
|                   | Third-party<br>environmental audit                             | Per Audit | 2        | 7,500           | 15,000           | MoF                                       |
| Capacity Building | ESMP training for<br>contractor & site staff                   | Session   | 4        | 2,500           | 10,000           | Contractors<br>approved budget            |
|                   | Community awareness<br>sessions                                | Session   | 4        | 1,500           | 6,000            | Contractors<br>approved budget<br>and MoF |
|                   | Development of site-<br>specific CEMP<br>documentation         | Lump Sum  | 1        | 5,000           | 5,000            | Contractors<br>approved budget            |
|                   | PPE and safety gear for<br>workers                             | Lump Sum  | 1        | 10,000          | 10,000           | Contractors<br>approved budget            |

| Category     | Activity                                  | Unit | Quantity | Unit Cost (USD) | Total Cost (USD) | Source of Fund |
|--------------|-------------------------------------------|------|----------|-----------------|------------------|----------------|
| Contingency  | Miscellaneous unforeseen ESMP costs (10%) | -    | -        | -               | 17,340           |                |
| <b>TOTAL</b> |                                           |      |          |                 | <b>190,740</b>   |                |

## **I. GRIEVANCE REDRESS MECHANISM (GRM)**

An independent, accessible and locally empowered Grievance Redress Mechanism (GRM) will be established to ensure that all stakeholders, including project-affected persons (PAPs), workers and community members, can raise concerns transparently and receive fair, timely resolutions.

The GRM is designed to operate at the project level, led by a dedicated Grievance Redress Committee (GRC) composed of representatives from the Project Implementation Unit (PIU), the Ministry of Finance, local communities (including elders, women, and youth), and the contractor. The committee ensures local ownership, gender inclusion, and responsive communication with all complainants.

The mechanism is accessible through multiple channels, including in-person, phone, SMS, WhatsApp, email, or drop boxes, and allows anonymous submissions. All complaints are recorded, acknowledged within three working days, and resolved within 15 working days. If unresolved, grievances can be escalated to the Ministry of Finance or pursued through Somalia's judiciary.

The GRM integrates traditional dispute resolution practices, ensures non-retaliation, and maintains a comprehensive Grievance Register for monitoring. Monthly reports are generated to track trends and improve stakeholder engagement and project risk management. This structure reinforces transparency, accountability, and trust between the project and the communities it affects.

## **CONCLUSION**

The Environmental and Social Impact Assessment (ESIA) concludes that the proposed demolition and reconstruction of the Ministry of Finance (MoF) headquarters is environmentally, socially and economically viable. The project presents significant potential to enhance public service delivery and promote institutional efficiency. With the full and consistent implementation of the proposed Environmental and Social

Management Plan (ESMP) and adherence to national and international safeguards the project poses no unmanageable adverse risks. Therefore, it is recommended that the project be granted environmental approval and proceed to implementation.

## **RECOMMENDATION**

Based on the findings of the Environmental and Social Impact Assessment (ESIA) it is recommended that the Ministry of Finance (MoF) proceed with project implementation subject to the full integration and enforcement of the Environmental and Social Management Plan (ESMP). This includes implementing all prescribed mitigation measures incorporating site-specific Environmental Occupational Health and Safety (EOHS) and GBV provisions into contractor obligations and maintaining continuous environmental and social monitoring. It is also recommended that a robust Security Management Plan be developed and enforced to safeguard workers equipment and the surrounding community. Additional measures such as grievance redress mechanisms stakeholder engagement gender and child protection safeguards and post-construction landscaping and site restoration should be prioritized. Capacity-building for contractors and project staff on safeguard compliance and emergency response is essential. Full compliance with national environmental legislation and AfDB Integrated Safeguards Systems (ISS) will ensure that the project proceeds responsibly sustainably and with minimal risk to people and the environment.

## **CHAPTER 1: INTRODUCTION**

### **1.1. Background**

The Ministry of Finance (MoF) of the Federal Government of Somalia (FGS) is embarking on a high priority infrastructure development initiative aimed at safeguarding its staff, preserving public assets, and improving institutional performance. The initiative entails the demolition of the existing six-storey Ministry of Finance office building in Mogadishu and the construction of a new eight-storey building on the same site to accommodate its operational, administrative and executive functions. To this end, the Ministry has formally requested financial support from the African Development Bank (AfDB) to finance the implementation of the proposed project, including associated environmental and social safeguards compliance measures.

The current Ministry building has reached a point of severe structural degradation, posing a direct and immediate threat to the safety and well-being of staff and visitors. In recent months, four ceilings across different levels of the building have collapsed unexpectedly. These incidents exposed severely corroded and weakened steel reinforcement bars embedded in deteriorating concrete. Internal assessments have also documented extensive cracking on multiple floors, bulging concrete slabs, and significant water seepage through the walls, indicating deep structural instability. One of the floors experienced a fire incident that was reportedly caused by sparks originating from faulty wiring inside the ceiling, further compounding the safety concerns. Based on these risks, the Ministry commissioned a professional structural integrity assessment which conclusively confirmed that the building was unfit for continued occupation and posed an imminent hazard. Consequently, the building has been completely evacuated and preparations for demolition are underway.

In light of these findings, the Government of Somalia, through the Ministry of Finance, has prioritized this project as a critical public safety and institutional resilience intervention. As the central agency responsible for fiscal governance, national budget coordination, tax administration, and donor engagement, the Ministry must operate from

a secure, functional and resilient infrastructure. Inadequate or unsafe office conditions threaten not only the delivery of core public services but also staff morale, data security, and public trust in governance systems. Therefore, the construction of a new modern facility is essential to maintain continuity of operations and to project a positive image of the state's rebuilding process.

The new building has been designed to provide a dignified, safe and efficient working environment. It will accommodate all key departments of the Ministry and allow for improved internal coordination, effective service delivery to the public and compliance with occupational health and safety standards. The proposed design will incorporate climate resilient materials and sustainable technologies that are aligned with Green Building Principles and Good International Industry Practice (GIIP). The building will also provide accessible public interface areas, modern ICT infrastructure, emergency exits, fire suppression systems and energy efficient utilities to ensure long-term sustainability, operational efficiency and environmental responsibility.

This Environmental and Social Impact Assessment (ESIA) has been prepared as a site-specific safeguards instrument to guide the environmentally and socially sound implementation of the project. It provides a comprehensive assessment of anticipated impacts associated with the demolition and construction phases. The ESIA process is being carried out in line with the AfDB's Integrated Safeguards System (ISS), particularly the Operational Safeguards on environmental and social assessment (OS1), labour and working conditions (OS5), and pollution prevention and resource efficiency (OS4). It also adheres to Somalia's National Environmental Policy (2019) and related regulatory frameworks, including Article 25 of the Provisional Constitution, which guarantees every Somali citizen the right to a clean and healthy environment.

Furthermore, the ESIA takes into account the realities of the urban context in which the Ministry is located. Mogadishu is a dense and dynamic city with significant security and infrastructure challenges. The project site is situated within a high-traffic government zone, adjacent to institutions such as the Central Bank of Somalia (CBS). This location

requires that all demolition and construction activities be implemented in a manner that minimizes disruptions to neighboring institutions, ensures public safety and upholds transparency and accountability in resource use. Extensive consultations have been undertaken with relevant stakeholders, including adjacent government offices, local authorities, engineers, staff representatives and environmental regulators to ensure inclusive and conflict sensitive planning.

It is also important to highlight that the project aligns with broader strategic development and governance reform priorities in Somalia. The reconstruction of public infrastructure is one of the key pillars of the country's National Development Plan (NDP-9) and is vital for restoring public confidence in state institutions. Moreover, the project supports the achievement of Sustainable Development Goals (SDGs), particularly Goal 9 (Industry, Innovation and Infrastructure), Goal 11 (Sustainable Cities and Communities), and Goal 16 (Peace, Justice and Strong Institutions). By ensuring that public institutions operate in safe, inclusive and accountable physical spaces, the project reinforces the role of infrastructure as a catalyst for governance, service delivery, and long-term peacebuilding.

From a safeguards' perspective, the ESIA identifies a range of potential environmental and social risks and impacts, including air and noise pollution during demolition, occupational health and safety concerns for workers, waste generation and disposal issues, risks to neighboring buildings, and community safety risks. During the construction phase, impacts could include dust emissions, increased water and energy use, disruption of nearby traffic, and short-term employment risks. However, these impacts are considered manageable and temporary in nature. Mitigation measures have been proposed under a detailed Environmental and Social Management Plan (ESMP), which outlines roles and responsibilities, monitoring indicators, budget provisions, and grievance redress mechanisms.

The ESIA also reaffirms the Ministry's commitment to transparency, stakeholder engagement and environmental stewardship. This commitment is reflected in the early initiation of consultations, the incorporation of feedback from affected stakeholders and



the adoption of safeguards that go beyond minimum legal requirements. For example, the Ministry intends to adopt an efficient construction waste management plan, ensure gender sensitive employment practices during construction and implement a code of conduct for workers to mitigate risks of gender-based violence and sexual exploitation.

The proposed project represents a strategic investment in Somalia's institutional infrastructure, addressing an urgent safety hazard while enhancing government efficiency and promoting environmental and social sustainability. With support from the African Development Bank, the Government of Somalia is committed to delivering a project that is technically robust, socially inclusive, and environmentally responsible. The rigorous preparation and implementation of this ESIA underscore the project's alignment with AfDB safeguards, Somali national laws and international best practices, ensuring that all potential impacts are proactively identified, mitigated and monitored throughout the project lifecycle.

## **1.2. Project Goal**

The goal of the project is to construct a new eight-storey building for the Ministry of Finance (MoF) of the Federal Government of Somalia (FGS) to replace the structurally unsafe existing building, ensuring a secure, efficient, and dignified workspace for staff and visitors while complying with environmental, social, and safety standards.

## **1.3. Objective of the ESIA**

The primary objective of the Environmental and Social Impact Assessment (ESIA) is to systematically identify, assess, and mitigate potential adverse environmental and social impacts arising from the demolition of the existing Ministry of Finance building and the construction of its replacement. This process ensures full compliance with the African Development Bank (AfDB) Safeguard Policies, which prioritize sustainable development, as well as Somali national laws and policies, including Article 25 of the Constitution (guaranteeing the right to a clean and healthy environment) and the National Environment Policy (2019). The assessment will also align with Good International Industry Practices

(GIIP), fostering accountability and transparency throughout the project lifecycle, while reinforcing positive impacts and promoting sustainable benefits for surrounding communities.

#### **1.4. Specific Objectives of the ESIA**

- To assess the anticipated environmental and social effects of the project, both in the near term and long run and to gauge the scale and significance of these effects in relation to the local context.
- To recommend site-specific strategies that will help avoid, reduce, or offset negative impacts while enhancing the project's potential benefits for the environment and nearby communities.
- To embed environmental and social responsibility into the project's planning and decision-making structures, ensuring that sustainability principles guide every phase of implementation.
- To promote an approach that balances development with environmental protection and social equity, by ensuring that the project upholds high standards of environmental stewardship and community welfare.
- To design a detailed Environmental and Social Management Plan (ESMP) that outlines the key measures, timelines and oversight mechanisms needed to manage identified risks and impacts effectively.
- To equip project teams and decision-makers with a clear environmental and social risk assessment tool, which enables early identification of issues and supports informed choices throughout project execution.
- To outline roles, responsibilities, and communication pathways among all involved stakeholders to ensure efficient coordination, accountability, and transparency in managing environmental and social safeguards.
- To estimate the resources required, financial, human and technical for ESMP implementation, and to ensure that these are built into the project's budgeting and operational frameworks.

- To identify gaps in knowledge, skills, and institutional capacity related to environmental and social safeguards, and to recommend targeted training and support that will empower stakeholders to uphold ESMP commitments.

### **1.5. Purpose of the ESIA**

The demolition and reconstruction of the Ministry of Finance office building will involve extensive construction and rehabilitation activities, including the use of heavy machinery and transportation of materials. These activities are likely to generate noise, vibrations, air and water pollution and increased traffic from heavy trucks. If not properly managed, these impacts could become severe and disrupt both human and natural environments. In particular, the surrounding natural resources may face degradation due to demolition waste and the sourcing of construction materials.

In this context, the Environmental and Social Impact Assessment (ESIA) aims to identify, analyze and evaluate the potential positive and negative effects of the proposed project. The objective is to ensure that the project is not only environmentally responsible and socially acceptable but also fully compliant with the Environmental Management Act of 2020 and all other applicable national regulations and policies.

Additionally, the African Development Bank (AfDB) requires environmental assessments for projects it finances to guarantee environmental soundness and sustainability while supporting informed decision-making. According to AfDB's operational guidelines, projects are screened and assigned to specific environmental categories based on their nature, size, location and potential environmental risks. This particular project has been classified as Category 2, indicating that although potential adverse impacts are site specific and manageable, they still warrant a detailed environmental assessment and the development of mitigation strategies.

## **1.6. Scope of the ESIA**

The scope of this Environmental and Social Impact Assessment (ESIA) covers all activities related to the demolition of the existing Ministry of Finance building and the construction of a new eight-storey office complex. It focuses on identifying, predicting, and managing the potential environmental and social risks that may arise throughout the project lifecycle from planning and site preparation to construction, operation, and decommissioning (if applicable).

Specifically, the ESIA will:

- Examine how project activities may affect air quality, noise levels, water resources, soil stability, biodiversity and waste generation.
- Assess the impacts of heavy machinery use, demolition debris, vibrations and construction material sourcing on both the physical environment and nearby communities.
- Evaluate social implications such as disruption to surrounding institutions, safety concerns for workers and the public and any potential displacement or access restrictions.
- Engage stakeholders, including local residents, government agencies and other interested parties, to capture their views and concerns.
- Propose realistic mitigation and enhancement measures through a comprehensive Environmental and Social Management Plan (ESMP).
- Ensure the project complies with Somali environmental laws, the Environmental Management Act (2020), and the African Development Bank's environmental and social safeguard policies.

## **1.7. Approach and Methodology for the Preparation of the ESIA**

The Environmental and Social Impact Assessment (ESIA) for the proposed demolition and reconstruction of the Ministry of Finance office building was conducted using a qualitative, participatory, and consultative approach. The study adhered to relevant

national regulations, including the Environmental Management Act (2020), and aligned with the African Development Bank (AfDB) Environmental and Social Safeguard Policies. The methodology was designed to ensure a comprehensive understanding of the project's potential impacts through document review, field observations, and stakeholder engagement.

## **1. Desktop Review**

The study team conducted a thorough review of relevant documents and existing literature to understand the legal, policy, and institutional context of the project. This included:

- Somali national environmental laws and policies, such as the Environmental Management Act (2020) and the National Environment Policy (2019)
- AfDB environmental and social safeguard frameworks
- Project design documents, building plans, and technical proposals
- Urban development guidelines and past environmental reports (where applicable)

## **2. Field Observations**

Site visits were carried out to observe and document the existing environmental and social conditions within and around the project area. The team visually assessed:

- The physical site and surrounding environment
- Nearby land use, public infrastructure, and sensitive areas
- Existing buildings, access roads, drainage patterns, and vegetation

## **3. Stakeholder Consultations**

Consultations with key stakeholders were conducted to gather qualitative insights and understand community perspectives. These engagements included:

- Key informant interviews with government officials, technical staff, and project developers
- Focus group discussions with residents, business owners, and neighboring institutions
- Informal interactions with passersby and local users of the space

#### **4. Impact Identification and Qualitative Analysis**

Environmental and social impacts were identified and analyzed based on the information gathered through field visits and stakeholder input. The impacts were:

- Classified as positive or negative, direct or indirect, and short-term or long-term
- Assessed qualitatively based on likelihood, severity, and potential significance
- Linked to specific project activities and phases (e.g., demolition, construction)

#### **5. Development of Mitigation and Enhancement Measures**

The study proposed practical and context-specific mitigation strategies to address the identified negative impacts and enhance potential benefits. These measures were designed to be realistic, locally appropriate, and responsive to stakeholder concerns.

#### **6. Preparation of the Environmental and Social Management Plan (ESMP)**

- An ESMP was developed as part of the ESIA report, detailing:
- Specific mitigation and enhancement actions
- Roles and responsibilities for implementation
- Qualitative indicators for monitoring progress
- Community engagement and feedback mechanisms
- Reporting procedures and timelines

### **1.8. Project Components**

The proposed project involves two main components:

### **i. Demolition Phase**

This phase entails the safe dismantling of the structurally compromised building, leveling of the site, and complete clearance of demolition debris in compliance with environmental, health, and safety regulations. Special attention will be paid to dust suppression, waste and debris management and occupational safety during demolition activities.

### **ii. Construction Phase**

The new eight-storey facility will be designed and constructed to accommodate the Ministry's executive, operational, and administrative functions. The building will feature a modern architectural design that emphasizes safety and resilience, ensuring structural integrity and the well-being of its occupants. It will also incorporate energy-efficient technologies and environmentally sustainable practices aimed at reducing the building's carbon footprint and operational costs. The internal layout will prioritize functional workspaces that enhance workflow and operational efficiency, while also promoting a conducive working environment. Additionally, the facility will be designed with accessibility in mind, ensuring that all members of the public can access services with dignity and ease. To support its operations, the building will be equipped with robust mechanical, electrical, and plumbing (MEP) systems that meet current standards and anticipate future technological needs. The activities for this phase will entail:

- Site excavation, ground stabilization, and laying of foundations;
- Erection of the structural frame and roofing;
- Installation of mechanical, electrical, and plumbing systems (MEP);
- Interior fit-outs, safety systems, accessibility enhancements, and landscaping.

## **1.9. Alternatives to the project**

Several alternatives were explored during the project design stage:

1. **No-Action Alternative:** Rejected due to severe risks to staff safety and total operational dysfunction.
2. **Renting an alternative facility:** No suitable office building within proximity could be identified to meet the Ministry's operational requirements.
3. **Co-location with the Central Bank of Somalia (CBS):** This was deemed unfeasible due to spatial constraints at the CBS facility and concerns about preserving the institutional independence of both entities.

N/B The construction of a new purpose-built structure on the existing site was identified as the most technically, economically, and operationally viable option.



## 1.10. Structure of the Report

Table 1: Structure of the report

| Sn | Chapter       | Description                                             |
|----|---------------|---------------------------------------------------------|
|    |               | Executive Summary                                       |
|    | Chapter one   | Introduction                                            |
|    | Chapter Two   | Project Description                                     |
|    | Chapter Three | Policy, Administrative and Legal Framework              |
|    | Chapter Four  | Baseline Environmental and Social Conditions            |
|    | Chapter Five  | Stakeholder Consultations                               |
|    | Chapter Six   | Impact Identification and Assessment                    |
|    | Chapter Seven | Analysis of Alternative                                 |
|    | Chapter Eight | Mitigation Measures for Potential Impacts               |
|    | Chapter Nine  | Grievance Redress Mechanism                             |
|    | Chapter Ten   | Environmental and Social Management and Monitoring Plan |
|    | Appendix      |                                                         |

## **CHAPTER 2: PROJECT DESCRIPTION**

### **2.1. Project Overview**

The proposed project involves the demolition of the existing six-storey Ministry of Finance (MoF) headquarters building in Mogadishu, Somalia, and the construction of a new eight-storey modern office complex on the same site. The current building has been deemed structurally unsound and unsafe for continued occupation due to severe physical deterioration, including collapsed ceilings, corroded reinforcement bars, cracked walls, water leakages, and electrical hazards. To eliminate risks to staff and visitors, the structure has been vacated and is scheduled for full demolition.

### **2.2. Project Location**

The proposed project is located at latitude 2.04000° N and longitude 45.34611° E (2°02'24" N, 45°20'46" E), within the central administrative zone of Mogadishu, the capital city of the Federal Republic of Somalia. The site specifically houses the current Ministry of Finance (MoF) headquarters, situated in the Banaadir Regional Administration. It lies directly opposite the Central Bank of Somalia (CBS) and is surrounded by key national institutions, including several other ministries and public sector offices. The area is a high-traffic urban setting served by major roads and public transportation, making it a strategically important location for federal government operations. This central positioning enhances accessibility and visibility but also necessitates strict environmental, health, and safety considerations during demolition and reconstruction activities.

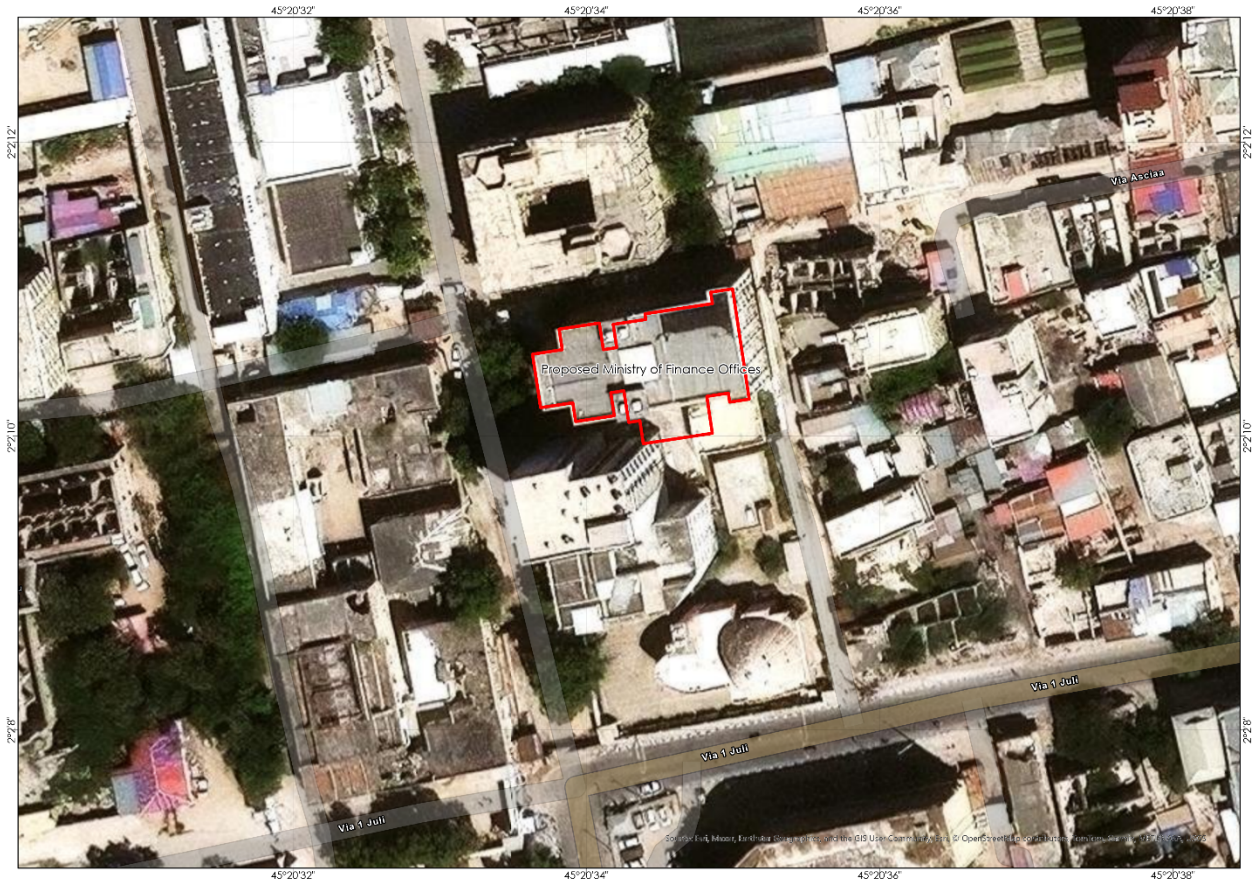


Figure 1: Project Location map

### 2.3. General Site Layout, Size, Capacity & Functional Allocation

The project involves demolishing the existing six-storey building to construct a new eight-storey headquarters on a rectangular 1,244 sqm (55.8 m x 22.3 m) plot, strategically positioned at the intersection of Corso Somalia Road (West) and Via Ahmed Bin Idriss (North). The layout prioritizes security and functional zoning, with controlled entry points, security screening and a reconstructed sally port. The ground floor will house public functions including the front desk, visitor lounges, bistro, a courtyard and external project collaboration hubs, while upper floors will accommodate private departmental offices and four executive suites, each with private lounges, kitchenettes and prayer rooms. The design incorporates ballistic-rated construction, safe rooms and integrated surveillance systems. Construction will follow a phased approach, beginning with demolition of the

existing structure, covered parking, and boundary walls. The new building will span a built-up area of approximately 6,800 sqm, with a height of approximately 34 m, distributed across 8 levels including rooftop and a basement parking to optimize the compact urban site.

The headquarters is designed to support 270-300 staff across executive and departmental offices with open-plan work pools, managerial suites, and support areas, while accommodating 50+ daily visitors in public lounges and breakout spaces. Key features include boardrooms on each floor and flexible office spaces such as the auxiliary/special programs zones for cross-departmental use and premium security measures (electronic access control, restricted zones). The executive floors will serve four high-ranking officials with dedicated suites, ensuring privacy and operational efficiency. By integrating dignified public interfaces with robust security and modern workspace design, the facility aims to meet the Ministry's administrative, operational and strategic needs while harmonizing with Mogadishu's evolving urban fabric.

Figure 2. Site Location Plan (Courtesy of ECOTECH)



Figure 2:Project Location Plan Source: Ecotech



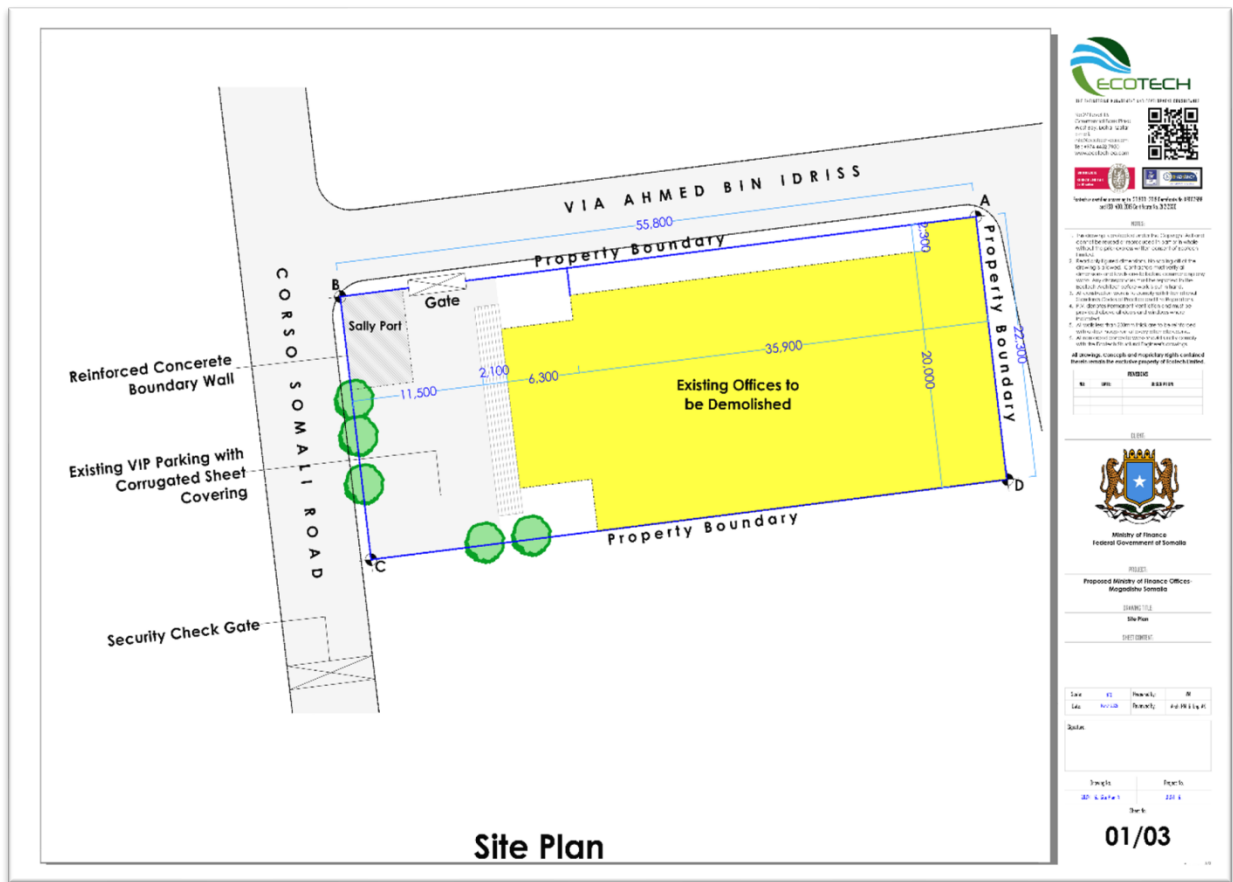


Figure 3: Project Site Plan

## 2.4. Project components

- i. **Executive Accommodation:** Provision of five executive suites, each comprising spacious offices, secretarial support areas with work pools, private lounges, kitchenette facilities, ensuite washrooms and dedicated prayer rooms. These suites will support five high-ranking Ministry executives.
- ii. **Privacy and Security Zoning:** Clear spatial graduation from public to private zones, with executive areas receiving premium levels of security. Features will include safe rooms, ballistic-rated construction elements, electronic access control and integrated surveillance systems.
- iii. **Departmental Offices:** Adequate workspaces for all Ministry departments, including open- plan work pools, managerial suites, and support areas, maintaining continuity with the current organizational structure.
- iv. **Meeting and Conference Facilities:** Allocation of at least two formal conference rooms, designed for high-level meetings and official engagements.
- v. **Public Interface:** Ample public lounges and informal breakout spaces to accommodate visitors and foster a welcoming, civic atmosphere.
- vi. **Project-based Accommodation:** Flexible office spaces intended to host temporary teams working on ongoing government programmes or inter-ministerial projects.
- vii. **Public Amenities:** Sufficient public spaces for visitors.

## 2.5. Project Phases

The proposed demolition and reconstruction of the Ministry of Finance (MoF) headquarters will be implemented in three distinct phases: Pre-Construction, Construction, and Post-Construction/Operational phases. Each phase is crucial in ensuring the success of the project and has associated environmental and social considerations.

## **1. Pre-Construction Phase**

The pre-construction phase primarily involves detailed planning and preparatory activities necessary before physical works commence. This phase begins with the finalization of the architectural and structural designs, followed by securing necessary regulatory approvals, including the Environmental and Social Impact Assessment (ESIA) clearance in accordance with Somali national regulations and the African Development Bank's safeguard requirements.

Site investigations will be conducted, including topographical surveys and geotechnical assessments, to determine the most appropriate engineering solutions for construction. Utility services such as electricity, water, sewerage and communication lines will be identified and safely disconnected prior to the start of demolition. Contractors and construction personnel will be mobilized to the site along with necessary equipment and materials. The site will be secured with fencing, signage and access control measures to ensure safety and minimize disruption to the surrounding urban area. Detailed environmental and social management plans (ESMPs) have been prepared to mitigate potential risks in the subsequent phases.

## **2. Construction Phase**

The construction phase is divided into two key sub-phases: demolition of the existing building and construction of the new eight-storey facility.

### **Demolition Sub-Phase:**

This sub-phase entails the safe and controlled demolition of the current six-storey Ministry of Finance building, which has been declared structurally unsound. Demolition works will involve mechanical dismantling of the structure, careful removal of debris and transport to designated disposal or recycling sites in compliance with environmental regulations. Dust suppression measures, noise control, proper PPE use and traffic management plans will be enforced to minimize health and safety risks to workers and the surrounding



community. All hazardous materials, if encountered, will be handled and disposed of following Good National regulations.

### **Construction Sub-Phase:**

Following site clearance and preparation, the construction of the new eight-storey office complex will commence. This will include excavation, foundation laying, erection of the structural framework and installation of the building envelope such as walls, windows, roofing and doors. Internal works will involve electrical wiring, plumbing, HVAC systems, flooring, partitions, ceilings and interior finishes. Modern security systems, fire detection and suppression systems, ICT infrastructure and sanitation facilities will also be installed. Site amenities such as parking areas, access roads, stormwater drainage, landscaping and perimeter fencing will be completed as part of this phase. All activities will adhere to the approved ESMP and environmental and social monitoring will be conducted regularly.

### **3. Post-Construction and Operational Phase**

The final phase of the project begins after construction is complete and the building has been successfully tested and commissioned. During this stage, all building systems—including electrical, plumbing, fire safety, and ICT—will undergo operational testing to ensure functionality and compliance with design standards. Final clean-up and decommissioning of temporary facilities will be carried out, and the site will be handed over to the Ministry of Finance.

The building will then be occupied by Ministry staff, and the new office will become fully operational. The facility is expected to support approximately 300 to 350 (400?) staff and provide modern, safe, and efficient workspaces for administrative, executive, and service delivery functions. This phase will also mark the beginning of regular maintenance activities and long-term monitoring of environmental and social safeguards to ensure sustainability and address any unforeseen impacts during operation.

## **2.6. Project/construction history**

The existing six-storey Ministry of Finance (MoF) building was originally constructed in 1982 and sustained significant damage during Somalia's civil war (1991–2007), remaining unoccupied throughout the conflict period. In 2016, as the Federal Government of Somalia intensified efforts to rebuild state institutions and civil service capacity expanded, ministries that had been operating from Villa Somalia were directed to return to their original premises. The Ministry of Public Works and Reconstruction evaluated the MoF building and, based on initial structural assessments indicating that the building remained sound, opted for rehabilitation over demolition. Rehabilitation works commenced in 2016, and the building was reopened for government use in 2017. However, recent comprehensive structural evaluations have revealed critical deficiencies in the building's core integrity, including deteriorating foundations and compromised load-bearing elements that no longer meet modern safety standards.

## **2.7. Proposed Construction schedule, staffing and support**

The implementation of the proposed Ministry of Finance (MoF) headquarters redevelopment project is planned to proceed through a phased schedule extending over a total duration of approximately 41 months. This includes both demolition of the existing structure and the complete construction of the new eight-storey building.

The first phase will involve structural demolition and salvaging works, projected to last up to four (4) months. This will entail the methodical deconstruction of the structurally compromised six-storey building currently occupying the site. Emphasis will be placed on safe dismantling practices, with a focus on salvaging all functional materials including furniture, fixtures and equipment (FF&E) in accordance with circular economy principles and solid waste minimization strategies. Materials deemed reusable will be repurposed for either this project or other public infrastructure initiatives, thereby supporting sustainability objectives.

Following demolition, a one (1) month site clearance and preparation period will be undertaken. Activities during this phase will include removal of residual debris, ground grading, geotechnical investigations (if needed), and the establishment of essential construction logistics such as fencing, access roads, temporary site offices and utility connections.

The core construction phase, involving the vertical development of the new building, is scheduled to span thirty-six (36) months. This phase includes comprehensive tasks across the project lifecycle, beginning with substructure and foundation works, followed by superstructure erection, building envelope installation and interior fit-out. In parallel, full MEP (Mechanical, Electrical, and Plumbing) integration will be implemented to ensure functional and sustainable systems within the building. The final stage will include testing and commissioning of all installed systems and facilities to ensure operational readiness and compliance with relevant safety, performance, and quality standards.

Throughout the project lifecycle, appropriate staffing and technical support will be mobilized to align with the complexity and scale of each phase. The demolition and construction phases will involve a multi-disciplinary team of professionals, including but not limited to: civil engineers, structural engineers, environmental and social safeguards specialists, architects, quantity surveyors, health and safety officers, construction managers and skilled and semi-skilled labourers. An experienced project management team will oversee quality assurance, environmental compliance, stakeholder coordination and adherence to timelines and budgetary controls. Where necessary, external consultants and contractors with expertise in high-security government infrastructure will be engaged, in line with procurement regulations and international best practices.

Logistical support facilities such as temporary offices, storage yards, water and sanitation services, and power supply will be established on-site to enable smooth implementation. The staffing structure will also ensure that occupational health and safety (OHS) standards are upheld, and that environmental and social mitigation measures identified in this ESIA are fully integrated during construction.

## 2.8. Facilities and services

The site has good space including, access to roads, parking areas, water storage, electricity distribution, and waste disposal facility.

### Health facilities

Currently, there are no dedicated health facilities or sick bays available at the proposed construction site. This presents a potential occupational health risk for workers who may suffer from illness or workplace injuries. While the nearest health facilities are approximately 1 kilometer away, reliance on these off-site facilities could pose challenges, especially during emergencies or in the absence of immediate transportation means. This gap necessitates the establishment of at least a temporary first aid station on-site, adequately equipped with first aid kits, essential medications, and trained occupational health and safety (OHS) personnel. Moreover, arrangements should be made for a standby vehicle or motorbike for emergency transportation. A formal agreement (MoU) with a nearby health facility for referral services would further ensure timely access to medical care, minimizing health-related disruptions to project timelines and enhancing worker welfare.

### Water Requirements

Water is an essential input throughout both the demolition and construction phases of the project. The water demand will be categorized as follows:

**Construction and Demolition Activities:** Water will be used for dust suppression, mixing concrete, curing, and cleaning tools and equipment. It is essential to maintain dust control measures to protect both workers' respiratory health and nearby receptors.

**Domestic Use by Workers:** Potable water will be required for drinking, handwashing, bathing (if needed), and cleaning purposes to uphold hygiene and prevent waterborne diseases.

**Toilet Flushing and Sanitation:** An adequate water supply is necessary to maintain sanitation in temporary on-site ablution blocks. Water-efficient fixtures should be considered to minimize waste.

**Fire Safety:** A reliable water supply must be guaranteed for fire prevention and control. This includes the provision of water storage tanks or reservoirs, fire extinguishers, and hydrants where applicable.

Water will primarily be sourced from existing piped connections at the site. In the event of supply interruptions or shortages, water trucks (bowzers) will be used to supply clean water. Water conservation measures, including rainwater harvesting where feasible, should be explored to ensure sustainability and reduce dependency on municipal supply.

## **Electricity**

Electricity is critical for various site operations during the construction phase. Power will be required for:

- Heavy Machinery and Equipment: Including crushers, batching plants, and mixers;
- Pre-Cast Yard Operations: Cutting, welding, and concrete preparation;
- Site Offices and Accommodation Units: For computers, lighting, communication, and office equipment;
- Site Lighting: Especially important for night operations and security, using portable light towers and permanent lighting installations where feasible.

Where grid electricity is not available or reliable, diesel-powered generators will be used as a backup source. The site will also consider integrating solar photovoltaic systems for a sustainable and cost-effective energy supply for lighting and charging stations

## **Solid waste**

Construction and demolition activities will generate various categories of solid waste, which need to be managed properly to prevent environmental pollution, occupational hazards, and regulatory non-compliance. Anticipated waste streams include:

- Excavated Soil and Earth: Resulting from site clearing and leveling, which should be reused for landscaping or backfilling wherever feasible.
- Packaging Materials: Including plastic wraps, cardboard and strapping materials from building components and equipment.
- Transportation Platforms and Pallets: Used for shipping construction materials.
- Wood and Metal Waste: Off-cuts from formwork, scaffolding and reinforcing bars.
- Demolition Debris: Including concrete, bricks and tiles.
- Sanitary Waste: From temporary worker facilities, requiring routine collection and disposal.

## **2.9. Project Activities/Operations**

The proposed project will involve a series of interconnected activities and operations during the pre-construction, construction and post-construction (operational) phases. Each stage will require specific inputs, resources and management interventions to ensure efficient implementation, compliance with environmental regulations and the health and safety of all stakeholders. Below is a summary of the main activities anticipated across the project lifecycle:

## **Preconstruction Phase Activities**

This phase includes all the planning, assessments, mobilization and preparations before any physical works begin.

- i. Site and Structural Assessments: Final review of the structural condition of the existing building and site investigations (e.g., soil testing, utility mapping).
- ii. Permitting and Approvals: Obtain necessary approvals and permits from government agencies and AfDB (e.g., building permit, demolition permit, ESIA approval).
- iii. Final Design Review: Finalization of building designs, structural drawings, and service plans (MEP – mechanical, electrical, plumbing).
- iv. Environmental and Social Planning: Completion and disclosure of the ESIA; preparation of the Environmental and Social Management Plan (ESMP).
- v. Procurement and Contracting: Hiring of contractors, consultants, and suppliers for demolition and construction.
- vi. Stakeholder Engagement: Informing the public and affected persons about the upcoming works, addressing concerns, and ensuring transparency.
- vii. Site Mobilization: Setting up temporary site offices, storage yards, worker welfare facilities, and access roads.
- viii. Utility Disconnection: Safe disconnection of water, electricity, and communication lines to the old building.

## **Mobilization of the Project Team and Resources to site**

Mobilization marks the beginning of physical project implementation and involves the deployment of the project team, construction machinery, materials and temporary facilities to the construction site. Key technical staff, including the Project Manager, Site Engineer, Safety Officer, Environmental and Social Safeguards Officer and other supervisory personnel, will be deployed. Additionally, casual and skilled labourers will be engaged, preferably from the local community, to support construction activities.

All personnel will undergo site induction and training on health and safety procedures, site rules, environmental safeguards, emergency response and prevention of gender-based violence and harassment. This ensures awareness of responsibilities and safety measures to reduce risks during construction.

Construction equipment such as excavators, concrete mixers, batching plants, generators, scaffolding and lighting towers will be transported to the site. All equipment will be inspected before use to ensure safety and environmental compliance. Initial deliveries of construction materials such as cement, steel, timber sand, and ballast will also be made and materials stored in well organized, secure areas to prevent damage and loss.

Temporary site infrastructure will be set up, including portable site offices, meeting spaces, and welfare facilities such as toilets, washing areas, drinking water stations and rest shelters. These facilities will support day-to-day operations and ensure worker comfort and hygiene throughout the construction phase.

Essential utilities such as water and electricity will be connected, either from the municipal grid or using alternatives like generators and water bowsers. Solar energy may also be used for basic lighting and charging needs.

Finally, safety signage, fire extinguishers, waste bins and first aid stations will be installed to ensure a safe working environment. Measures for environmental protection, including dust suppression, noise control and fencing off sensitive areas, will be implemented in line with the Environmental and Social Management Plan (ESMP).

### **Anticipated workforce**

The demolition and construction phases of the project are expected to employ over 100 workers, including both skilled and unskilled labour. To promote inclusive local development, the project shall implement deliberate measures to ensure that at least 60% of the workforce is recruited from the local community. This approach will not only provide



income-generating opportunities to local households but also foster community support, ownership, and goodwill toward the project.

### **Demolition Phase Activities**

The existing building requires demolition. This means the operations or activities currently taking place within the Ministry of Finance building will need to be shifted and the entire building completely evacuated. This phase focuses on the safe dismantling and removal of the existing building.

- Safety setup will be undertaken, including the installation of safety signage, fencing, and traffic control measures to secure the site and protect both workers and the general public.
- A hazardous materials survey will be conducted to identify the presence of any dangerous substances such as asbestos, lead-based paints, or chemicals. If found, these materials will be safely removed and disposed of following approved safety protocols and environmental standards.
- Demolition of the building will be carried out using both manual and mechanical methods, with controlled deconstruction performed in stages to minimize structural risks and avoid uncontrolled collapses.
- Reusable materials and components will be salvaged during the demolition process. Items such as office furniture, fixtures, fittings, and metal parts in good condition will be carefully removed, stored, and either reused in the new construction or responsibly recycled.
- A structured waste management plan will be implemented to ensure that demolition debris is sorted, stored appropriately, and safely transported to designated disposal sites. Recyclable materials will be separated and handled according to circular economy principles.
- Dust and noise control measures will be enforced, including the regular spraying of water to suppress dust, installation of noise barriers where necessary, and

scheduling of high-noise activities during less disruptive hours to minimize impact on the surrounding community.

- Site clearance will follow the demolition process, with all remaining debris and rubble removed. The site will then be leveled and prepared for the commencement of the new building's construction phase.

## **Construction Phase Activities**

This phase involves the full-scale development of the new Ministry of Finance headquarters, comprising several sequential and overlapping work packages:

### **i. Site Preparation**

Site preparation marks the initial phase of physical construction activities. This involves final grading of the land, ground leveling and thorough soil compaction to establish a stable and even base for the upcoming building foundation. To support subsequent construction operations, temporary utilities such as water supply, electricity, lighting and sanitary facilities will be installed across the site. Additionally, surface drainage channels will be set up to effectively manage stormwater runoff during the construction period. Transportation and delivery of primary construction materials such as gravel, sand, cement, steel and prefabricated components will be conducted using trucks, loaders and other heavy machinery, ensuring timely mobilization and material availability on-site.

### **ii. Substructure Works**

The substructure phase includes foundational works designed to anchor the new building securely into the ground. Activities will begin with extensive excavation and trenching for building foundations, basement and underground utility services. Once the site is excavated to the required depth, concrete footings, foundation slabs and, if applicable, basement components will be cast. This will be followed by backfilling around the foundation walls, accompanied by soil compaction to prevent future settlement and provide long-term structural stability.

### **iii. Superstructure Works**

This phase involves the vertical development of the new eight-storey building, starting with the erection of reinforced concrete structural elements. Beams, columns, slabs, staircases and elevator shafts will be constructed floor by floor up to the final level. Roof slabs and any architectural features such as parapets or skylights will be included in this

stage. Continuous delivery and careful handling of key materials, such as formwork, steel reinforcement bars, concrete and structural steel, will take place to maintain uninterrupted progress.

#### **iv. Building Envelope**

The building envelope serves to protect the interior environment while contributing to the building's energy efficiency and aesthetics. This phase will involve the construction of external walls using either blockwork or precast concrete panels. Windows, doors and façade elements will be installed to ensure weatherproofing, daylight access and security. External surfaces will be finished with plaster, paint, or cladding, providing durability and enhancing the building's external appearance.

#### **v. MEP (Mechanical, Electrical, and Plumbing) Installations**

This stage focuses on integrating the essential building systems that support occupant comfort and functionality. Electrical works will include the installation of internal wiring, lighting, sockets and standby power infrastructure such as generators or inverters. Plumbing systems will be fitted for water supply, toilets, kitchens and drainage. HVAC systems for heating, ventilation and air conditioning will be installed, alongside fire safety systems such as alarms, detectors and extinguishers. Information and communication technology (ICT) infrastructure, comprising internet cabling, telephone lines, and networking components, will also be embedded.

#### **vi. Interior Fit-Out**

Once structural and service installations are complete, attention will turn to the interior spaces. This phase includes the installation of ceilings, wall partitions, doors and various flooring types such as tiles, carpet, or vinyl. Painting and decorative works will be undertaken to provide a professional and welcoming environment. Office furniture, built-in storage units, internal signage, and advanced security systems such as CCTV and access control panels will be installed to complete the working environment.



## **vii. External Works**

External works are designed to enhance accessibility, safety and the general appearance of the site. These will include the construction of paved parking spaces, internal roads, pedestrian walkways, and ramps. Security will be improved through the erection of perimeter fencing and the installation of automated entry gates. The site will also be equipped with external lighting systems, guardhouses, and stormwater drainage infrastructure. Landscaping works featuring the planting of trees, grass lawns, decorative shrubs, and benches will be completed to improve environmental aesthetics and create a pleasant setting.

## **viii. Testing and Commissioning**

The final stage of construction involves systematic testing and commissioning of all systems to verify performance and compliance with design specifications. Electrical, plumbing, mechanical, and fire safety systems will be inspected and tested under operating conditions. Any defects identified during this process will be rectified before handover. Facility management personnel will be trained on the operation and maintenance of the installed systems. The site will undergo a comprehensive cleaning, removal of construction waste and final touch ups in preparation for formal occupancy by the Ministry of Finance.

## **Project Staff and Working Hours**

It is estimated based on the nature of work to be done on the site, this project will employ over 100 persons, both local and international, where necessary. The site's working hours will be in line with the Federal Government of Somalia's employment legislation.

## **Campsite Establishment**

The implementation of the proposed project will necessitate the engagement of a substantial workforce, including both local personnel and expatriates, as well as a wide array of construction equipment. Given the expected scale of manpower and machinery involved, the contractor will set up a dedicated workers' camp and equipment storage yard. Depending on the agreement reached between the Ministry of Finance and the contractor, this accommodation may either involve establishing new temporary facilities or repurposing existing rooms at the project site. As a result, on-site domestic activities such as cooking and laundry are expected to be minimal or entirely outsourced. To address food needs, arrangements may be made with external vendors to supply ready-made meals to workers. Nonetheless, daily work activities will still generate domestic and sanitary waste, which will require appropriate management throughout the project duration.

## **Operation Phase Activities**

The operation phase commences upon the successful completion, testing, and official handover of the new Ministry of Finance headquarters building. This phase is focused on the active use, maintenance, and management of the facility to ensure it functions efficiently, safely, and sustainably. The following key activities will be undertaken during the operation phase:

- i. **Occupancy and Use:** The building will be occupied by Ministry of Finance staff who will carry out a wide range of administrative, executive and operational functions. The facility is expected to accommodate departments, service units and leadership offices in a secure, modern and dignified workspace.
- ii. **Maintenance and Repairs:** To sustain the integrity and functionality of the building, routine and preventive maintenance will be conducted. This includes regular cleaning, servicing of HVAC systems, electrical and plumbing checks, replacement of worn-out components, and scheduled inspections to ensure optimal performance of all building systems.

- iii. **Safety and Security Monitoring:** The building will be continuously monitored to uphold the highest standards of safety and security. This includes operating CCTV systems, managing access control, conducting regular fire and emergency drills, and ensuring that all safety equipment remains in good working condition.
- iv. **Waste Management:** Day-to-day solid waste, including paper, packaging materials and domestic refuse generated by office use, will be collected, sorted and disposed of responsibly. Measures will be implemented to promote waste segregation and recycling in line with environmental best practices.
- v. **Facility Management:** Dedicated facility management personnel or outsourced service providers will oversee the operations of critical systems such as elevators, fire detection and suppression systems, standby power units, water supply, and ICT infrastructure. This ensures seamless service delivery and minimal disruptions to daily operations.
- vi. **Community Engagement:** The building will serve as a point of interaction between the government and the public. A secure and welcoming public interface will be maintained to facilitate service delivery, public inquiries and community relations, thereby reinforcing public trust and accessibility.

## **2.10. Required off-site investments**

The successful implementation of the proposed Ministry of Finance headquarters project will rely on a few critical off-site investments to ensure seamless construction, utility provision, and long-term operation of the facility. Key off-site requirements include:

- **Utility Connections:** Upgrading and extending existing municipal services such as electricity, potable water supply and telecommunications infrastructure to meet the new building's increased demand. Coordination with utility service providers will be essential.
- **Access Road Improvements:** Minor improvements to existing access roads and pedestrian walkways may be necessary to accommodate increased traffic by



construction vehicles and later, daily users of the facility. This may involve minor road grading or resurfacing.

- Solid Waste Disposal Arrangements: Engagement with municipal waste management services or private contractors to handle construction and operational waste off-site in line with environmental standards.

### **2.11. Anticipated life span of the proposed building**

The newly proposed Ministry of Finance headquarters building is being designed with a long-term operational vision, guided by modern engineering standards, durable materials and resilient infrastructure systems. The anticipated life span of the building is at least 50 years, provided that regular maintenance and necessary renovations are carried out in line with international best practices.

This life expectancy aligns with the design intent to ensure structural stability, energy efficiency, user safety and adaptability to future technological and administrative needs. With sustainable construction techniques and adherence to high-quality building codes, the facility is expected to serve the Ministry's operational, administrative, and public service functions for several decades without the need for major overhauls.

## **CHAPTER 3: POLICY, ADMINISTRATIVE AND LEGAL FRAMEWORK**

The implementation of the proposed Ministry of Finance (MoF) building project will take place within a well-defined and multi-layered legal, policy, and institutional framework. This framework integrates the national legislation and regulatory instruments of the Federal Republic of Somalia, the environmental and social safeguard policies of the African Development Bank (AfDB)—the project’s primary financier—as well as internationally recognized environmental and social standards and good practices. These instruments collectively provide the legal and operational basis for conducting Environmental and Social Impact Assessments (ESIAs), enforcing environmental protection, promoting social equity, and ensuring sustainable infrastructure development. This section outlines the most relevant laws, policies, and institutional actors involved in the ESIA process, and also provides a capacity assessment of the public entities responsible for environmental and social safeguards enforcement. Particular emphasis is placed on their readiness, decentralization status, and ability to support compliance monitoring, both at the federal and regional levels, throughout the project lifecycle.

### **3.1. National Legal Framework**

#### **The Constitution of the Federal Republic of Somalia**

The Provisional Constitution of Somalia (2012) provides a comprehensive framework for governance, including environmental protection. Article 25 of the Bill of Rights guarantees every person the right to an environment that is not harmful to their health or well-being, and Article 45 explicitly mandates the state to adopt measures to ensure sustainable environmental development and prevent harm to the environment. These constitutional provisions place a legal obligation on both the government and project proponents to ensure environmental protection for the benefit of both present and future generations.

In alignment with these constitutional directives, any activity or project implemented within the territory of Somalia must conform to the state's vision for sustainable environmental management. The proposed project is a significant development initiative that interacts

with sensitive elements of the natural and physical environment. Therefore, there is a constitutional and policy imperative for a well-defined Environmental Management Plan (EMP) to mitigate potential adverse impacts on both the local ecosystem and the communities within the project area and beyond.

**Relevance:**

*The Constitution of the Federal Republic of Somalia is the supreme legal instrument guiding all environmental laws and policies. Article 25 guarantees every individual the right to a clean and healthy environment. In alignment with this constitutional provision, the preparation of this Environmental and Social Impact Assessment compiled within this Project Brief—demonstrates compliance with national environmental regulations and affirms the project's commitment to upholding the rights of present and future generations to a safe and sustainable environment.*

**The Somalia National Environmental Policy**

The Somalia National Environmental Policy (NEP) aims to improve the quality of life for current and future generations through the sustainable management and responsible use of environmental and natural resources. The policy emphasizes that environmental conservation is not only a matter of ecological preservation but also a critical pillar for economic growth, livelihoods and the provision of vital ecosystem services such as watershed protection, biodiversity conservation and carbon sequestration.

The policy explicitly acknowledges the interdependence between human rights and environmental protection, affirming that human rights particularly the rights to health, life, and dignity cannot be fully realized without access to a safe, clean and healthy environment, in line with the constitutional guarantees under Article 25 and Article 45 of the Somalia Provisional Constitution 2012.

In accordance with Part IV, Section 4.1 of the National Environmental Policy, Environmental Impact Assessments (EIAs) are mandatory for all public and private projects likely to have significant environmental effects. The policy requires that such projects must obtain prior environmental clearance and licensing from the Ministry of Environment and Climate Change before implementation can proceed.

The proposed project will be implemented in strict compliance with the core guiding principles of the National Environmental Policy, including:

- The right to a clean and healthy environment;
- The duty to safeguard and enhance the environment;
- The right to sustainable development;
- Efficient and equitable resource use;
- Integration of social, economic, and environmental considerations in development planning.

Environmental resources will be managed in a manner that maintains their quality, productivity, and ecological integrity, while promoting the long-term resilience of supporting ecosystems and ensuring that stakeholder rights and interests are respected throughout the project lifecycle.

**Relevance:**

*The Somalia National Environmental Policy (NEP) is directly applicable to the proposed demolition and construction of the Ministry of Finance building, as it mandates Environmental Impact Assessments for projects with potential environmental impacts. In line with Part IV, Section 4.1, and constitutional Articles 25 and 45, the project will be guided by the policy's principles, ensuring the right to a clean and healthy environment, promoting sustainable development, and integrating environmental, social, and economic considerations into planning. By adhering to these provisions, the*

*project aims to protect ecosystem services, uphold community rights, and foster long-term environmental resilience.*

### ***Environmental Management Act (2020)***

The Environmental Protection and Management Act (2024) (hereafter "the Act") provides the legal backbone for environmental governance and Environmental Impact Assessment (EIA) procedures in Somalia. The Act offers a broad definition of the environment and underscores the need to minimize environmental degradation, prevent waste generation, protect livelihoods and conserve environmental assets. Its overarching aim is to promote sustainable development through effective control and use of natural resources, aligning with both national development goals and international environmental standards.

A key requirement under Section 56 of the Act, further reinforced by the Environmental and Social Impact Assessment (ESIA) Regulations (2024), is that any project likely to have a significant impact on the environment, such as the proposed demolition and construction of the Ministry of Finance building must undergo a comprehensive ESIA. The EIA must be conducted by a licensed expert and approved by the Ministry of Environment and Climate Change (MoECC) before the commencement of project activities. This legal provision ensures that potential environmental and social risks are identified, evaluated, and mitigated in advance.

In addition, the Act and its regulations prescribe clear timelines and steps for public participation. According to Regulation 14 of the ESIA Regulations (2024), the Ministry must acknowledge receipt of an EIA application within 14 days and must issue a decision within 45 to 90 days. The law emphasizes the importance of community involvement, requiring project proponents to conduct a scoping process, publish public notices, and organize at least three public consultation sessions, including specific outreach to vulnerable and marginalized groups. Furthermore, stakeholders must be given a minimum of 20 working days to submit written comments on the project.

Under Article 57 of the Act, all EIA submissions must include a detailed Environmental and Social Management Plan (ESMP). This plan must outline the specific mitigation measures to be implemented during project execution, along with clear timelines, responsible parties, estimated costs, and monitoring mechanisms. The ESMP serves as a binding commitment between the project proponent and the regulatory authorities to ensure environmental safeguards and social accountability are upheld throughout the project lifecycle.

**Relevance:**

*The Environmental Protection and Management Act (2024) is directly relevant to the proposed demolition and construction of the Ministry of Finance building, as it mandates a comprehensive Environmental and Social Impact Assessment (ESIA) for projects with significant environmental impacts. In compliance with Section 56 and Article 57 of the Act, the project will incorporate a detailed ESIA and Environmental and Social Management Plan (ESMP), ensuring that potential risks are identified and mitigated. The project will also follow all legal procedures for public participation and approval, upholding environmental sustainability and social accountability throughout its implementation.*

**Environmental and social impact Assessment regulation (2021)**

The Environmental and Social Impact Assessment (ESIA) Regulation (2024) was adopted by the Federal Government of Somalia to implement the provisions of the Environmental Protection and Management Act (2024). The regulation aims to ensure that all development projects are planned and executed in an environmentally and socially responsible manner. It promotes sustainable development by protecting and conserving natural resources and ensuring that projects do not harm the environment or local communities.

Under this regulation, all projects that are likely to have significant environmental or social impacts, such as the demolition and construction of the new Ministry of Finance building, must undergo a full ESIA process. This includes submitting a Project Brief and Terms of Reference, carrying out a detailed assessment, and obtaining approval from the Ministry of Environment and Climate Change before the project can begin.

The regulation also emphasizes public participation. Project proponents are required to conduct at least three public consultation meetings, involving community members, including vulnerable groups. Public notices must be published in advance, and the community is given time to submit comments and concerns. These inputs must be considered during the assessment process.

In addition, the ESIA report must include an Environmental and Social Management Plan (ESMP), which outlines the mitigation measures, timelines, responsible parties, and monitoring plans. This ensures that all potential negative impacts are addressed and that the project follows best environmental practices throughout its implementation.

The regulation also provides for ongoing monitoring and auditing. Certified experts are required to conduct environmental and social audits, and the Ministry has the power to inspect sites, issue compliance certificates, and take enforcement actions if a project fails to meet its obligations.

**Relevance:**

*The Environmental and Social Impact Assessment (ESIA) Regulation (2024) is highly relevant to the proposed Ministry of Finance building project, as it legally requires a full ESIA for any development likely to cause significant environmental or social impacts. The project must comply with this regulation by conducting a detailed assessment, facilitating public consultations, and submitting an Environmental and Social Management Plan (ESMP) for approval. This ensures that environmental risks are*

*identified and mitigated, community voices are included, and the project is implemented sustainably and responsibly.*

### **Somali National Disaster Management Policy**

The Somali National Disaster Management Policy is designed to enhance the country's ability to prepare for, respond to, and recover from disasters and emergencies. It establishes a legislative foundation for effective disaster risk management within government institutions and promotes the integration and coordination of humanitarian efforts from international partners. The policy focuses on building community resilience and ensuring that disaster response is timely, well-organized, and aligned with both national and international standards.

#### **Relevance:**

*Accidents and emergencies are potential risks in projects of this nature. This policy is therefore highly relevant, as it provides essential guidance for the contractor and all involved stakeholders in formulating and implementing effective disaster management plans to ensure safety and preparedness throughout the project lifecycle.*

#### **Somalia National Climate Change Policy (NCCP):**

The Somalia National Climate Change Policy (NCCP) was developed to enable a well-coordinated and effective response to the challenges and opportunities posed by climate change at the local, national and global levels. The policy adopts a cross-cutting mainstreaming approach to ensure that climate change considerations are fully integrated into development planning, budgeting and implementation across all sectors and tiers of government. Its core objective is to strengthen adaptive capacity, enhance resilience to climate variability, and promote sustainable, low-carbon development pathways.

The NCCP provides a strategic framework for government institutions, private sector actors, and communities to identify, plan and implement suitable adaptation and



mitigation measures that reduce climate related risks. In doing so, it supports Somalia's efforts to achieve its national development goals and align with global commitments such as the Sustainable Development Goals (SDGs).

All phases of the proposed development project including construction, operation, and eventual decommissioning must align with the NCCP to ensure climate resilient and environmentally sustainable implementation.

**Relevance:**

*The NCCP is particularly relevant to the proposed development, as it ensures that climate risks are considered at every stage of project planning and implementation. By aligning with the policy, the project will contribute to national climate resilience goals, integrate climate adaptation and mitigation measures, and promote sustainable infrastructure development that is responsive to the realities of climate change.*

**The Somalia National Transformation (NTP) 2025-2029**

The Somalia National Transformation Plan (NTP) 2025–2029 serves as a strategic framework for guiding the country's sustainable development and socio-economic progress. It emphasizes inclusive growth, good governance, institutional strengthening, and climate resilience, while prioritizing key sectors such as infrastructure development, economic diversification, and social services like education and healthcare. The plan also supports environmental sustainability and disaster risk reduction in line with Somalia's Vision 2060 of becoming a peaceful, democratic, and economically stable nation.

**Relevance:**

*The proposed construction of the Ministry of Finance building directly supports the NTP's development priorities by enhancing institutional infrastructure and public sector efficiency. As a key government*

*facility, the project contributes to improved governance, economic management, and service delivery. Its alignment with the NTP ensures that infrastructure development is pursued in a way that promotes sustainability, resilience to climate change, and inclusive national growth.*

### **National Infrastructure Strategy (2019–2063)**

The National Infrastructure Strategy provides a long-term roadmap for rebuilding and sustaining critical infrastructure to foster Somalia's stability and development. Its core objective is to rehabilitate, operate and maintain essential infrastructure that supports socio-economic growth, job creation, food security, climate resilience and cultural preservation. In the short term (first five years), the strategy aims to establish the foundational systems, institutions, standards, legal frameworks and resource mobilization mechanisms needed for resilient and inclusive infrastructure planning, urban development and long-term national transformation.

#### **Relevance:**

*This strategy is highly relevant to the proposed project, as the construction of the Ministry of Finance building contributes directly to the broader goal of establishing resilient public infrastructure. By aligning with the strategy, the project will not only enhance government service delivery but also support national infrastructure standards and address the current labour market demands by creating employment opportunities during construction and operation.*

### **3.2. State Level Environmental and Social Regulations and Guidelines**

The Federal Member States of Somalia are confronted with notable institutional deficiencies that are evident in the absence of crucial environmental and social laws. At

the federal member state (FMS) level, with the exception of Puntland State, the rest of the States (Jubbaland, Hirshabelle, Galmudug, and South-West State) lack substantial legislative frameworks for overseeing the management of the environment and natural resources sector. The same applies to Banaadir Regional Administration (BRA), and it continues to be challenging to incorporate comprehensive policy, legislative, and institutional frameworks for these states in this ESIA.

### ***Puntland Environment Policy***

Article 96 of the Constitution of Puntland recognizes the significance and safeguarding of the environment, addressing issues such as pollution, deforestation, and soil erosion are integral components. Trading in charcoal and endangered plant and animal species is prohibited by the Constitution. Additionally, the development of unsustainable urban sprawls in rural areas is also prohibited. The following are issues related to the environmental protection and management in Puntland:

- Environmental Policy (2014) approved by the Cabinet and Parliament
- Environmental Management Act (2016) approved by the Cabinet
- Puntland Rangeland Management Policy, 2<sup>nd</sup> Edition (2016-2025)
- Puntland Waste Management Policy (2016)
- EIA Act and Regulation (2016) approved by Cabinet and Parliament
- Puntland Climate Change Strategy (2016)
- Ministry of Environment and Climate Change Strategic Plan (2016-2020)
- Puntland Sexual Offences Act 2016

### **3.3. International Conventions Signed and Ratified by Somalia**

Somalia is a party to several international treaties, agreements, and conventions that promote environmental protection, sustainable natural resource management, and the prevention of environmental degradation. These legal instruments provide a global framework that supports the implementation of environmentally sound development projects, such as the Somalia Economic Infrastructure Program (SEIP). Their relevance to the proposed project lies in ensuring that environmental and social considerations align with international obligations. Key conventions include:

- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) – Regulates international trade in endangered species to ensure their survival.
- Convention on the Conservation of Migratory Species of Wild Animals (CMS) – Aims to conserve terrestrial, marine, and avian migratory species throughout their range.
- Regional Convention for the Conservation of the Red Sea and the Gulf of Aden Environment – Protects the marine environment and coastal areas of the Red Sea and Gulf of Aden.
- Montreal Protocol on Substances that Deplete the Ozone Layer – Controls the production and consumption of ozone-depleting substances.
- United Nations Convention to Combat Desertification (UNCCD) – Focuses on land degradation and promotes sustainable land management.
- United Nations Framework Convention on Climate Change (UNFCCC) – Guides actions to mitigate and adapt to climate change impacts.
- Kyoto Protocol to the UNFCCC – Establishes legally binding obligations for developed countries to reduce greenhouse gas emissions.
- Convention on Biological Diversity (CBD) – Promotes the conservation of biodiversity, sustainable use of its components, and fair sharing of benefits.
- Cartagena Protocol on Biosafety to the CBD – Addresses the safe handling, transport, and use of living modified organisms (LMOs).

- Basel Convention – Regulates the transboundary movement and disposal of hazardous wastes.
- Stockholm Convention – Controls the production and use of persistent organic pollutants (POPs).
- Rotterdam Convention – Promotes shared responsibilities in the importation of hazardous chemicals.
- Protocol Concerning Regional Cooperation in Combating Pollution by Oil and Other Harmful Substances in Cases of Emergency – Enhances preparedness and response to marine pollution emergencies.
- United Nations Convention on the Law of the Sea (UNCLOS) – Governs all aspects of ocean space, including marine resources and environmental protection.
- Nairobi Convention (Convention for the Protection, Management and Development of the Marine and Coastal Environment of the Eastern African Region) – Encourages regional cooperation for the sustainable management of the marine and coastal environment.
- International labour Organization (ILO) Conventions – Somalia has ratified key conventions that safeguard workers' rights, promote decent working conditions, and prohibit forced or child labour. These apply directly to the recruitment, safety, and welfare of workers during the construction and operation phases.
- African Union Convention on the Conservation of Nature and Natural Resources – This regional convention encourages member states to adopt policies and strategies that ensure the sustainable use of natural resources and environmental protection during development.
- Convention on Biological Diversity (CBD) – The CBD promotes the conservation of biodiversity and the sustainable use of natural resources. This is relevant where the project might impact ecosystems, land use, or biodiversity during construction activities.

### **3.4. The African Development Bank's Environmental and Social Standards (AfDB)**

The Federal Government of Somalia, through the Ministry of Finance, acknowledges the critical importance of integrating environmental and social sustainability into national development projects. In line with this commitment, the Ministry affirms that the proposed project will be financed through the African Development Bank (AfDB) and will fully comply with the Bank's environmental and social sustainability requirements.

The AfDB promotes a comprehensive approach to development that incorporates environmental and social considerations at every stage of the project cycle. This is guided by the Integrated Safeguards System (ISS) a framework designed to identify, prevent, and mitigate adverse environmental and social impacts while enhancing development outcomes.

The ISS comprises a set of Operational Safeguards (OS) that establish standards and procedures to ensure that projects are environmentally sound and socially inclusive. These safeguards are reinforced by the Environmental and Social Assessment Procedures (ESAPs) and accompanying technical guidelines, which provide clear and actionable directives for borrowers, such as the Ministry of Finance, on how to meet AfDB safeguard requirements.

Furthermore, the ISS includes Sectoral Guidelines and Technical Directives, offering methodological tools and best practices for managing issues such as biodiversity, pollution control, labour conditions, climate change, involuntary resettlement, and community engagement. These tools ensure that all interventions are aligned with international best practices and deliver tangible benefits to communities, particularly the most vulnerable.

The Ministry of Finance is fully committed to implementing the project in strict adherence to the AfDB's Integrated Safeguards System. This will ensure that environmental and

social risks are effectively managed and that the project contributes positively to Somalia's sustainable development goals, resilience, and inclusive growth.

The ISS consolidates the five specific safeguard criteria that Bank clients must adhere to when managing environmental and social impacts and risks. These criteria align with five Operational Safeguards (SOs), concise policy statements that delineate the operational conditions for Bank- financed operations. Table 2.5 below presents an overview of the relevant Operational Safeguards and their significance to the project.

Table 2: Applicable AfDB Operational Safeguards (OS)

| AfDB Operational Safeguard                                                    | Description                                                                                                                                                                                                                                                                                     | Relevance to the MoF Building Project                                                                                                                                                                                                                                                                                |
|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OS 1: Environmental and Social Assessment                                     | Sets out overarching requirements for identifying, assessing and managing potential environmental and social risks. Includes climate change vulnerability, stakeholder engagement and grievance redress. Emphasizes avoiding significant damage to cultural heritage (physical and intangible). | This safeguard is triggered. The project involves demolition and new construction in a central urban area, with potential impacts on air quality, water, noise, waste, public safety and possibly cultural heritage. A full ESIA, ESMP, and Stakeholder Engagement Plan (with grievance redress) have been prepared. |
| OS 2: Involuntary Resettlement: Land Acquisition, Displacement & Compensation | Ensures fair, culturally sensitive treatment and compensation for displaced persons; aims to restore or improve livelihoods and standard of living.                                                                                                                                             | Not triggered. The project is being implemented on government owned land. There is no expected resettlement, displacement, or land acquisition involved.                                                                                                                                                             |
| OS 3: Biodiversity and Ecosystem Services                                     | Requires the identification and conservation of biodiversity and natural                                                                                                                                                                                                                        | Triggered. The project may source raw materials (e.g., sand, gravel) from natural environments and may affect drainage and green spaces. Measures to mitigate off-site                                                                                                                                               |



| AfDB                                                                                | Operational | Description                                                                                                                                     | Relevance to the MoF Building Project                                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Safeguard                                                                           |             |                                                                                                                                                 |                                                                                                                                                                                                                                                       |
|                                                                                     |             | habitats, as well as sustainable use of ecosystem services.                                                                                     | impacts (e.g., from quarrying) are included in the ESMP.                                                                                                                                                                                              |
| OS 4: Pollution Prevention and Control, Hazardous Materials and Resource Efficiency |             | Addresses pollution (air, water, noise), waste, hazardous materials, and resource efficiency, guided by international EHS standards.            | Triggered. The project will generate construction waste, noise, dust and may involve hazardous materials (e.g., asbestos during demolition). The ESMP outlines pollution control, waste management, and safety measures, aligned with EHS Guidelines. |
| OS 5: labour Conditions, Health and Safety                                          |             | Requires protection of workers' rights and safe, healthy working conditions. Prohibits child and forced labour. Promotes fair labour practices. | Triggered. The project will employ many workers during construction. The ESMP includes measures on occupational health and safety (OHS), worker welfare and contractor compliance with national and AfDB labour standards.                            |

| AfDB<br>Safeguard       | Operational | Description                                                                        | Relevance to the MoF Building Project                                                                                                                                                                      |
|-------------------------|-------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Climate<br>System (CSS) | Safeguards  | Provides tools for screening and managing risks related to climate change impacts. | Relevant. The building design considers climate resilience, including energy efficiency, flood risk management and sustainable building materials. A basic climate risk screening was conducted under OS1. |

In accordance with the African Development Bank's (AfDB) Integrated Safeguards System (ISS), the level of environmental and social assessment and management must be commensurate with the potential risks and impacts posed by a project (AfDB, 2015). The AfDB mandates that all Bank-financed projects undergo environmental and social screening in line with its Environmental and Social Assessment Procedures (ESAPs). Based on the screening outcomes, projects are classified into one of four categories 1, 2, 3, or 4, ensuring the assessment approach is proportionate to the project's risk profile.

This particular project is classified as a Category 2 investment, which indicates that it has the potential to generate significant adverse environmental and social impacts, although these are generally less severe, site-specific and more readily mitigated than those associated with Category 1 projects. As such, a full Environmental and Social Impact Assessment (ESIA) is required, along with the preparation of an Environmental and Social Management Plan (ESMP).

The ESIA process serves to identify, predict and evaluate potential environmental and social impacts associated with the project. The findings of the ESIA inform the development of a comprehensive ESMP, which outlines practical and actionable mitigation, monitoring and institutional measures to be implemented throughout the project lifecycle. In line with the ISS, meaningful stakeholder engagement and public consultations must be conducted during the ESIA process to ensure transparency, inclusivity and social accountability. Additionally, a summary version of the ESMP must be disclosed to the public to facilitate access to project information and encourage community participation.

Table 3: Institutional Framework for Environmental and Social Management in Somalia

| Institution                                        | Mandate/Description                                                                                                                                                                           | Relevance to the MoF Project                                                                                                                                                                                                                                       |
|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Office of the Prime Minister (OPM)                 | Central coordinating entity for all national ministries and agencies. Formerly housed the Directorate of Environment and Climate Change (DECC), responsible for environment policy oversight. | Ensures national coherence in environmental oversight. Works through federal and local environmental committees to coordinate monitoring, inspections and enforcement of compliance across all ministries, including environmental safeguards for the MoF project. |
| Ministry of Environment and Climate Change (MoECC) | Established in 2022; responsible for environmental protection, conservation, climate resilience, and coordination of multilateral environmental agreements.                                   | Core oversight institution for environmental compliance. Ensures that demolition and construction activities comply with environmental standards, including waste management, emissions control and sustainable resource use.                                      |
| Ministry of labour and Social Affairs (MoLSA)      | Regulates labour markets, skills development, and workplace policy, including oversight of TVET centers.                                                                                      | Ensures fair labour practices during construction. Oversees employment standards and enforces policies related to decent work, contracts and safety regulations for construction workers.                                                                          |

| Institution                                                              | Mandate/Description                                                                                                                | Relevance to the MoF Project                                                                                                                                                                     |
|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Department of Occupational Safety and Health (DOSH) <i>(Under MoLSA)</i> | Enforces occupational health and safety at workplaces, guided by the Somalia labour Code (Act No. 31 of 2004) and ILO conventions. | The contractor must register the site as a workplace. DOSH inspectors will conduct regular inspections to ensure compliance with safety measures and use of personal protective equipment (PPE). |
| Ministry of Energy and Water Resources (MoEWR)                           | Manages water and energy resources, including setting standards and ensuring environmentally sound practices.                      | Supports sustainable design for the MoF building, particularly in areas of energy efficiency, water management, and resource conservation. Provides input during design and implementation.      |
| Ministry of Gender, Labour and Social Development (MoGLSD)               | Promotes gender equality, child protection, cultural preservation, and safe working conditions.                                    | Ensures gender-responsive hiring practices and protection of vulnerable workers. Upholds cultural norms and occupational health standards during the construction phase.                         |
| Somali Police Force                                                      | Maintains law and order, protects lives and property, and manages public security in project areas.                                | Provides security at project sites. Responds to incidents like theft, injury, or accidents. Contractors must report incidents to the nearest police posts.                                       |

| Institution                                    | Mandate/Description                                                                                                                                                            | Relevance to the MoF Project                                                                                                                                                                                                                                                             |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mogadishu City Administration (Mayor's Office) | Oversees urban development, public services, and law enforcement in the capital. Includes technical departments such as Environmental Officer, Engineer, and District Planner. | Grants local approvals, monitors waste management, sanitation and construction impacts. Coordinates community engagement and ensures local compliance with city development regulations.                                                                                                 |
| Ministry of Finance (MoF)                      | Oversees national budget planning, public investment and financial compliance. Coordinates donor relations and ensures integration of safeguard standards.                     | Lead project implementing agency. Responsible for financial oversight, procurement and ensuring compliance with AfDB's environmental and social safeguards throughout the demolition and reconstruction of the MoF building. Coordinates across ministries for efficient implementation. |

Table 4:Key Institutions to the ESIA process

| Level    | Institution                                        | Roles and Responsibilities (Specific to the Project)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| National | Ministry of Environment and Climate Change (MoECC) | <p>Lead oversight on environmental compliance during demolition and construction activities.</p> <p>Approve the Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP).</p> <p>Ensure adherence to national environmental policies, standards, and international conventions.</p> <p>Monitor and enforce mitigation measures to prevent pollution, protect air and water quality, manage waste, and control noise levels.</p> <p>Conduct inspections and audits to prevent environmental degradation throughout the project lifecycle.</p> |
| National | Ministry of labour and Social Affairs (MoLSA)      | <p>Ensure worker health and safety measures are implemented at all demolition and construction sites. Enforce labour regulations, including use of Personal Protective Equipment (PPE), safe work practices and prevention of child or forced labour.</p>                                                                                                                                                                                                                                                                                                                                 |

| Level               | Institution                                                         | Roles and Responsibilities (Specific to the Project)                                                                                                                                                                                                                                                                          |
|---------------------|---------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |                                                                     | Monitor occupational safety compliance and investigate any workplace incidents.                                                                                                                                                                                                                                               |
| <b>Sub-National</b> | <b>Banaadir Regional Administration – Department of Environment</b> | <p>Enforce municipal environmental by-laws and waste management regulations during demolition and construction.</p> <p>Oversee noise control, air quality, debris disposal and hazardous waste handling in coordination with the contractor.</p> <p>Participate in community engagement and grievance redress mechanisms.</p> |
| <b>Sub-National</b> | <b>Banaadir Regional Administration – Health and Safety Units</b>   | <p>Monitor public health and safety risks in and around the construction area.</p> <p>Coordinate emergency preparedness and response in the event of accidents or hazardous material exposure. Ensure that temporary health hazards (e.g., dust, noise, debris) are managed in accordance with public health regulations.</p> |



### 3.5. Capacity assessment of Somalia's public entities in charge of ESA enforcement and oversight

Effective enforcement of environmental and social safeguards for the demolition and reconstruction of the Ministry of Finance building in Mogadishu depends on the capacities of several Somali public entities. This section assesses these institutions according to their mandates, technical and financial capacities and coordination mechanisms and outlines key recommendations for enhancing their effectiveness.

#### 1. Ministry of Environment and Climate Change (MoECC)

**Institutional Mandate:** The MoECC is the primary regulatory body responsible for environmental management in Somalia. Its mandate includes policy formulation, implementation of national environmental frameworks, oversight of Environmental and Social Impact Assessments (ESIAs), and coordination of international environmental agreements.

**Technical Capacity:** The Ministry lacks sufficient technical staff specialized in urban environmental management, particularly those with experience in overseeing demolition and construction-related impacts such as debris disposal, air quality and cultural heritage preservation.

**Financial Capacity:** MoECC suffers from budgetary constraints that limit its ability to carry out frequent field inspections, conduct environmental audits, or deploy monitoring equipment.

**Coordination Mechanisms:** Coordination between MoECC and local authorities like the Banaadir Regional Administration is informal and inconsistent, resulting in gaps in oversight at the site level.

**Recommendations:** There is an urgent need for capacity-building in construction ESIA oversight, provision of mobile monitoring units, and formalization of coordination structures with municipal authorities.

## **2. Ministry of labour and Social Affairs (MoLSA) – Department of Occupational Safety and Health (DOSH)**

**Institutional Mandate:** DOSH is tasked with enforcing occupational health and safety regulations and ensuring worker protection at registered workplaces, including construction sites.

**Technical Capacity:** While DOSH has some capacity for routine inspections, it lacks up-to-date occupational safety standards aligned with international best practices. The number of trained inspectors is also limited.

**Financial Capacity:** Resource constraints affect its ability to perform regular monitoring, respond to safety incidents, or conduct emergency drills at high-risk sites.

**Coordination Mechanisms:** Coordination between DOSH, contractors, and environmental authorities is ad hoc, with no centralized incident reporting or compliance database.

**Recommendations:** Updating Somalia's labour code, training additional safety inspectors, and establishing a central registry for workplace inspections are vital steps for improvement.

## **3. Banaadir Regional Administration – Department of Environment**

**Institutional Mandate:** This department enforces environmental laws and bylaws at the city level, including waste management, air and noise pollution control, and urban land use regulation.

**Technical Capacity:** The Department has limited skilled staff and lacks the tools for real-time monitoring of environmental risks at demolition or construction sites.

**Financial Capacity:** The department operates with a constrained budget, impacting its enforcement ability and capacity to handle environmental grievances.

**Coordination Mechanisms:** Although it works with national ministries, joint inspection protocols are weak, and data-sharing mechanisms are underdeveloped.

**Recommendations:** The department should be equipped with monitoring tools (e.g., air quality meters, PPE, drones) and receive dedicated funding for site-level inspections during the construction phase.

#### **4. Ministry of Finance (MoF)**

**Institutional Mandate:** As the project proponent, MoF oversees budgeting, contracting, and overall project delivery, including integration of environmental and social safeguards into procurement processes.

**Technical Capacity:** The Ministry lacks an in-house Environmental and Social Safeguards Unit and depends on external consultants for ESIA implementation and monitoring.

**Financial Capacity:** MoF has strong financial systems, allowing for resource allocation to safeguard implementation, but lacks designated budget lines for ongoing ESMP supervision.

**Coordination Mechanisms:** Coordination with enforcement agencies is limited and typically ends once contracts are awarded, lacking a long-term oversight plan.

**Recommendations:** MoF should establish a dedicated safeguards officer role or unit and ensure that contractors' adherence to the ESMP is tracked as a condition for payment.

#### **5. Somali Police and Security Forces**

**Institutional Mandate:** The police are responsible for maintaining law and order, protecting workers and property, and managing conflict or emergencies at construction sites.

**Technical Capacity:** Officers are generally not trained in environmental emergencies or public health issues linked to construction (e.g., dust exposure, hazardous waste).

**Financial Capacity:** Resources are limited for specialized training or deploying officers specifically for environmental and social compliance.

**Coordination Mechanisms:** The police work reactively and are not part of routine project implementation meetings or safety planning.

**Recommendations:** Basic environmental risk management training should be provided to officers stationed near the construction site, and their inclusion in site safety briefings should be institutionalized.

While Somalia's public institutions have laid the foundation for environmental and social oversight, significant gaps in technical skills, monitoring tools, inter-agency collaboration and legal frameworks persist. For the Ministry of Finance building project, targeted capacity enhancement, including staff training, provision of tools, updating of policies and better institutional coordination, is essential to ensure the project meets both national standards and AfDB's operational safeguards.

## **CHAPTER 4: BASELINE ENVIRONMENTAL AND SOCIAL CONDITIONS**

This section presents the existing environmental and socio-economic conditions within and around the proposed project site for the demolition and reconstruction of the Ministry of Finance building in Mogadishu, Somalia. Understanding the baseline conditions is essential for identifying potential environmental and social impacts and for developing appropriate mitigation measures. The analysis includes the physical, biological, and socio-economic setting of the area, identifies environmentally and socially sensitive receptors, and defines the boundaries of the project's area of influence. It also highlights existing conditions that may change before project implementation, ensuring that the environmental and social assessment is grounded in a clear and accurate understanding of the local context.

### **4.1. Dimensions and Boundaries of the Study Area and Surrounding Areas Likely to be Environmentally Affected**

The core project site is the Ministry of Finance (MoF) compound located in central Mogadishu, Banaadir Region. The site, which is fully paved and enclosed, occupies approximately 1,244 square meters, with dimensions of 55.8 meters by 22.3 meters. It currently hosts aging administrative structures that are planned for demolition and replacement with a new modern multi-storey building. As the compound is already developed and lacks exposed soil or vegetation, direct environmental disturbance within the immediate project footprint is expected to be limited. However, the nature of demolition and construction activities will temporarily intensify environmental and social pressures in the vicinity, such as dust generation, noise emissions, and potential safety risks.

The immediate zone of influence extends to a radius of 500 meters from the boundaries of the MoF site. Within this 500-meter study area are various social and environmental receptors that may be affected during project implementation. These include other government offices, commercial and informal traders, mosques and religious centers, educational institutions, vocational training facilities, residential blocks, and public roads.

The activities associated with demolition, construction, and materials transportation may temporarily disrupt normal routines, particularly in relation to traffic flow, pedestrian safety, air quality, and access to nearby institutions. Vulnerable groups such as informal vendors, the elderly, people with disabilities, and schoolchildren may be disproportionately impacted within this zone.

Beyond the immediate 500-meter radius, the project is also likely to have indirect effects in a broader area of influence. These extended impacts may be felt along the transport corridors used for the delivery of construction materials and the removal of debris, potentially affecting traffic flow and road safety in the city. There may also be institutional or economic connections beyond the immediate zone, as many of the ministry's staff, service users, or suppliers commute from other parts of Mogadishu. Additionally, the urban drainage systems that serve the area may carry construction-related runoff beyond the site, particularly during rainy seasons, thereby requiring environmental consideration beyond the core boundary.

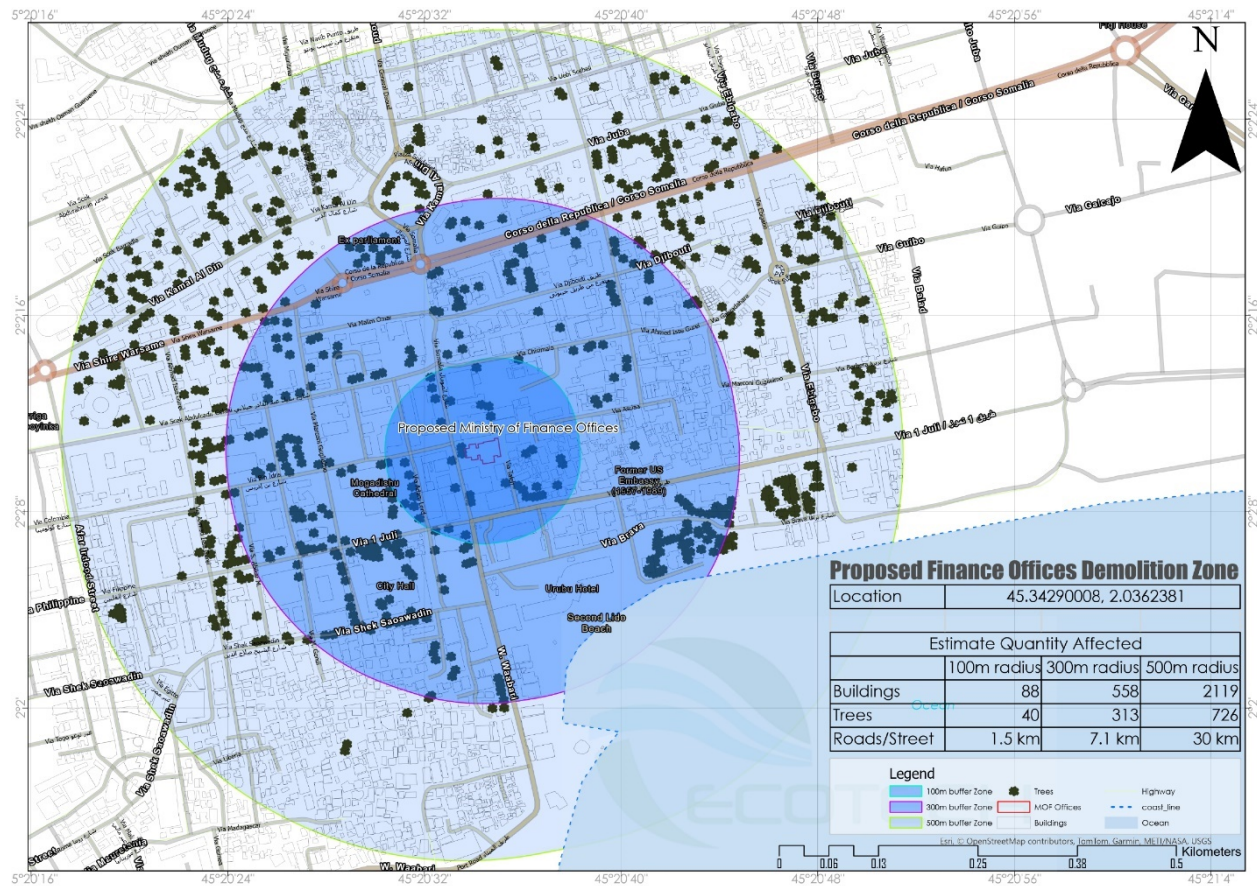


Figure 4: View of the Area likely to be potentially affected by the project Implementation

## 4.2. Physical Location and Project Settings

The proposed project is located in Mogadishu, the capital city of Somalia, situated on the country's southeastern coastline along the Indian Ocean. The Ministry of Finance building sits within a densely built-up urban zone characterized by government institutions, commercial activities and transport corridors. The project area falls under the jurisdiction of the Banaadir Regional Administration.

The area is accessible via major roads, including Wadada Maka Al Mukarama and Jidka Wadnaha, which connect various government and commercial hubs. It is approximately 2 km from the Indian Ocean coastline and within 5 km of Aden Adde International Airport. The site is bounded by mixed land uses, including administrative offices, small businesses, residential housing and community facilities.



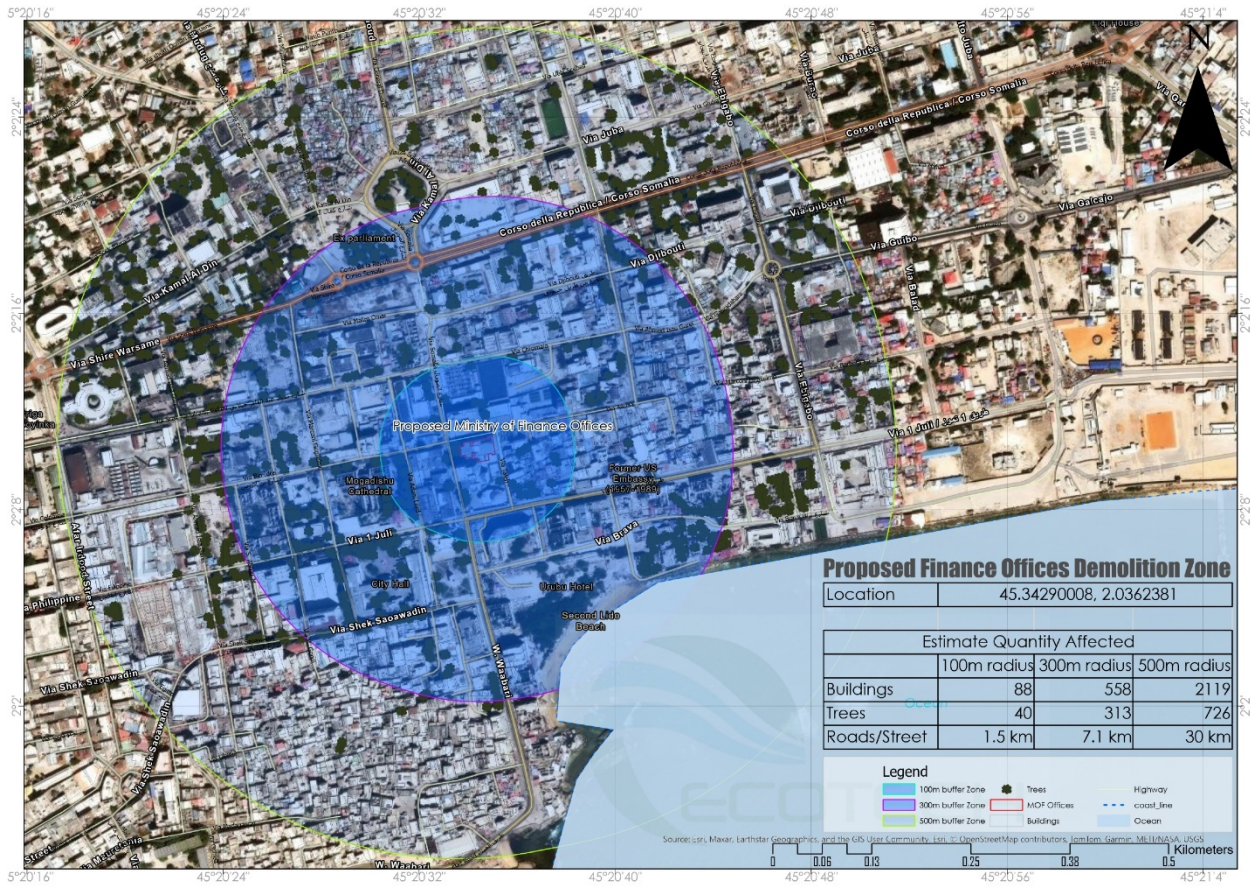


Figure 5: Project Location



### **4.3. Physical Environment**

#### **(a) Topography**

The project area, located in Mogadishu, features a generally flat and low-lying terrain characteristic of the city's broader coastal plain. Elevation ranges between 9 to 12 meters above sea level, with minimal slopes or elevation changes. While the relatively level ground is advantageous for construction, facilitating excavation, foundation laying, and structural stability, it also presents challenges. The area has poor natural drainage and is prone to localized flooding, especially during the rainy seasons. These topographical features make it essential for the project design to integrate adequate stormwater drainage and flood risk mitigation measures to prevent construction delays and ensure long-term resilience.

#### **(b) Climate and Meteorology**

Mogadishu experiences a hot, semi-arid climate (Köppen classification BSh), characterized by high temperatures throughout the year and limited, irregular rainfall. The city has two main rainy seasons: the Gu (April to June) and the Deyr (October to November), with April and May typically being the wettest months. Annual rainfall averages between 430 mm to 500 mm, although this can vary significantly year to year.

Temperatures remain relatively constant, with average daily highs ranging from 27°C to 34°C and nighttime lows rarely dropping below 23°C. Humidity levels are generally moderate to high, particularly along the coast. The city is also affected by seasonal monsoon winds, with the southwest monsoon (Gu) prevailing from April to September, bringing higher humidity and occasional storms, while the northeast monsoon (Jilal) from December to March is drier and cooler.

Due to its coastal location, Mogadishu is influenced by the Indian Ocean's moderating effect, which helps prevent extreme temperature fluctuations. However, climate change has led to increased weather variability, including more intense rainfall events and longer

dry periods, posing growing risks to infrastructure and water resources in the region. These factors must be considered in the planning and implementation of any major construction project, including the proposed Ministry of Finance building.

### **(c) Drainage and Stormwater Runoff**

Mogadishu suffers from poor drainage infrastructure, a longstanding issue that significantly affects both urban development and public health. The city lacks a comprehensive, functional stormwater drainage system, which means that surface runoff from rainfall has limited channels for proper discharge.

The terrain of Mogadishu is generally flat and low-lying, which further compounds drainage challenges. During the rainy seasons (Gu and Deyr), even moderate rainfall can result in localized flooding, especially in low-lying neighborhoods and informal settlements. Water tends to accumulate rapidly in streets, open spaces, and construction sites, leading to stagnation, erosion, and disruption of transport and business activities.

In the absence of engineered drainage solutions, communities rely on informal ditches, shallow channels, and natural depressions to redirect water. These are often inadequate, becoming easily overwhelmed during heavy downpours. In some areas, solid waste and debris clog natural and man-made drainage paths, further exacerbating the risk of flooding.

Given these conditions, any infrastructure project, including the demolition and construction of the Ministry of Finance building, must incorporate robust site-specific stormwater management measures. These may include temporary drainage provisions, raised foundations, rainwater harvesting, or permeable pavements to reduce runoff and mitigate flood-related impacts during and after construction.



Figure 6: View of stagnant water on the ministry HQ compound

#### **(d) Water Resources**

Mogadishu faces significant challenges in terms of access to sustainable and safe water resources. The city lacks a perennial surface water source, such as a major river or lake. As a result, groundwater is the primary source of water for both domestic and commercial use.

Groundwater in Mogadishu is typically accessed through shallow wells and boreholes, many of which are unregulated and vary significantly in water quality. Due to over-extraction, especially in densely populated areas, groundwater levels are declining in some zones, and salinity levels are increasing, particularly in areas close to the coastline.

The coastal nature of the city makes its aquifers vulnerable to saltwater intrusion, especially when overpumping occurs without adequate recharge.

There is no centralized public water supply system serving the entire city. Instead, water is provided through a combination of private vendors, water trucking services, and small-scale distribution systems. These methods are often expensive and unreliable, posing risks to public health and sanitation, especially in informal settlements.

Rainwater harvesting is practiced on a limited scale but is underutilized due to a lack of infrastructure and public awareness. Furthermore, contamination risks from poor sanitation infrastructure and uncontrolled waste disposal threaten the safety of both groundwater and stored rainwater.

Given the fragile and overstretched water resources, construction projects, including the Ministry of Finance building, must be planned with water conservation, efficient usage and protection of local aquifers in mind. Measures such as rainwater harvesting systems, water-efficient plumbing fixtures, and site-specific hydrological assessments should be integrated into both design and operation phases.

#### **(e) Ambient Air Quality**

The ambient air quality in Mogadishu, including the area surrounding the proposed Ministry of Finance (MoF) building site, is generally moderate and within acceptable thresholds, with no major industrial pollution sources in the vicinity. According to real-time air quality data from IQAir (2024) and OpenAQ, PM<sub>2.5</sub> concentrations typically range between 8–12 µg/m<sup>3</sup>, corresponding to an Air Quality Index (AQI) of 45–60. These levels fall within the “Good” to “Moderate” categories and are below the World Health Organization (WHO, 2021) 24-hour mean exposure guideline of 15 µg/m<sup>3</sup> for PM<sub>2.5</sub>. The main sources of air pollution in the area include:

- Vehicular emissions, especially from aging diesel-powered vehicles
- Open burning of household and municipal waste

- Emissions from diesel generators used during power outages
- Windblown dust from unpaved roads and exposed soils

Although the project site is not situated within a recognized pollution hotspot, the planned demolition and reconstruction works are expected to result in temporary, localized increases in dust and particulate matter ( $PM_{10}$  and  $PM_{2.5}$ ). These could impact on-site workers and nearby sensitive receptors, such as residences, schools, or healthcare facilities, if not properly managed.

Key construction activities likely to generate emissions include:

- Demolition of existing structures
- Earthworks and excavation
- Transportation and disposal of construction materials and waste

While baseline air quality monitoring was not conducted during this Environmental and Social Impact Assessment (ESIA), the existing low background levels and absence of significant industrial activity suggest minimal long-term risks. Nonetheless, routine air quality monitoring is recommended during the demolition and construction phases, particularly during high-impact operations.

Table 5: Ambient Concentrations of Common Air Pollutants and WHO Thresholds  
(Mogadishu, 2025)

| Pollutant                                          | Description                                                | Real-time Level (2025)              | Unit                    | WHO 24-hr Guideline               | Status vs WHO Limits |
|----------------------------------------------------|------------------------------------------------------------|-------------------------------------|-------------------------|-----------------------------------|----------------------|
| <b>PM<sub>2.5</sub> (Fine Particulate Matter)</b>  | Penetrates deep into lungs                                 | 10.3 µg/m <sup>3</sup>              | µg/m <sup>3</sup>       | 15 µg/m <sup>3</sup>              | Below limit          |
| <b>PM<sub>10</sub> (Coarse Particulate Matter)</b> | Irritates upper respiratory tract                          | 15.5 µg/m <sup>3</sup>              | µg/m <sup>3</sup>       | 45 µg/m <sup>3</sup>              | Below limit          |
| <b>TSPM (Total Suspended Particulates)</b>         | PM <sub>2.5</sub> + PM <sub>10</sub> + larger particulates | ~60 µg/m <sup>3</sup> (estimated)   | µg/m <sup>3</sup>       | ~100 µg/m <sup>3</sup>            | Acceptable           |
| <b>NO<sub>2</sub> (Nitrogen Dioxide)</b>           | Traffic/combustion pollutant                               | 0.23 ppb (~0.43 µg/m <sup>3</sup> ) | ppb / µg/m <sup>3</sup> | 25 µg/m <sup>3</sup> (~13 ppb)    | Well below limit     |
| <b>SO<sub>2</sub> (Sulphur Dioxide)</b>            | Emissions from fossil fuels                                | 0.11 ppb (~0.3 µg/m <sup>3</sup> )  | ppb / µg/m <sup>3</sup> | 40 µg/m <sup>3</sup> (~15 ppb)    | Well below limit     |
| <b>CO (Carbon Monoxide)</b>                        | From incomplete fuel combustion                            | 110 ppb (~126 µg/m <sup>3</sup> )   | ppb / µg/m <sup>3</sup> | 10,000 µg/m <sup>3</sup> (~9 ppm) | Well below limit     |
| <b>O<sub>3</sub> (Ozone)</b>                       | Reactive gas, formed photochemically                       | ~75 µg/m <sup>3</sup> (≈37.7 ppb)   | µg/m <sup>3</sup>       | 100 µg/m <sup>3</sup> (8-hr mean) | Below limit          |



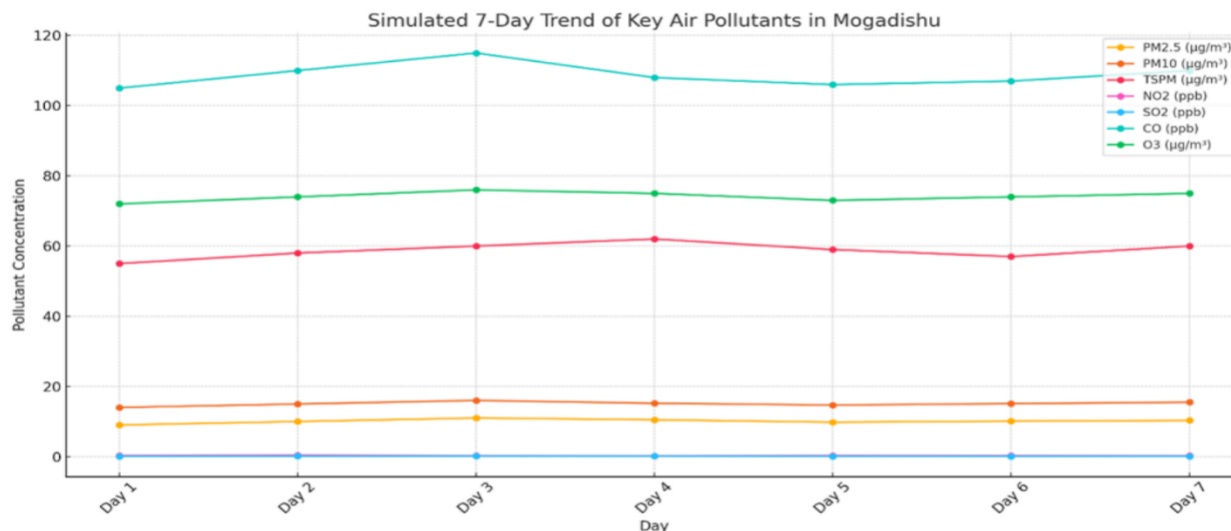


Figure 7: Simulated 7-day trend of key pollutants in Mogadishu (Source: OpenAQ)

This line graph illustrates a simulated 7-day trend of key ambient air pollutants measured in Mogadishu, with concentrations plotted for each day.

#### Key Observations:

- CO (Carbon Monoxide) levels (light blue line) are the highest throughout the week, averaging around 105–115 ppb, but remain within WHO limits.
- TSPM (Total Suspended Particulate Matter) and O<sub>3</sub> (Ozone) show moderate levels (around 55–75 µg/m³), with slight daily fluctuations.
- PM10 and PM2.5 (orange and gold lines) are present at lower concentrations (~12–17 µg/m³), which are within safe exposure thresholds.
- SO<sub>2</sub> and NO<sub>2</sub> (light green and red lines) remain consistently low (under 2 ppb), indicating minimal pollution from combustion or industrial sources.

Air quality in Mogadishu remains relatively stable and within international health safety standards throughout the week, with no major spikes in any pollutant. The graph supports the assessment that air pollution risk at the MoF site is low, though continued monitoring is advisable during construction activities.

## **(f) Ambient Noise and Vibration**

In the current baseline condition, ambient noise levels in central Mogadishu—including at the proposed Ministry of Finance (MoF) project site—typically range between 55 and 65 decibels [dB(A)] during daytime hours. These levels are primarily attributable to vehicular traffic (cars and motorcycles), informal street-level commercial activities, and intermittent use of diesel generators. There are no significant industrial noise sources in the vicinity, which helps maintain ambient noise within tolerable limits for urban environments.

According to the World Health Organization (WHO, 1999) Community Noise Guidelines, this range falls within or slightly above the acceptable threshold for daytime noise in residential and office zones ( $\leq 55$  dB[A]). Nevertheless, elevated background noise can already pose minor discomfort to noise-sensitive receptors, particularly in institutions such as schools or health facilities.

During the demolition and construction phases, temporary but significant increases in noise and ground vibration levels are anticipated due to the intensive use of equipment and site activity. The main sources of noise during these phases will include:

- Demolition tools (e.g., pneumatic hammers, jackhammers): 85–100 dB(A)
- Concrete mixers, compactors, vibrators: 75–90 dB(A)
- Earth-moving machinery (e.g., bulldozers, backhoes, excavators): 80–95 dB(A)
- Heavy-duty trucks (loading/unloading, hauling debris and materials): 80–90 dB(A)

These projected noise levels substantially exceed WHO's guideline limit for residential and institutional areas, especially for prolonged exposure. Such noise emissions may result in temporary nuisance, communication interference, and mild stress-related responses among nearby office workers, community members, or other sensitive receptors. The impacts will be most pronounced during peak construction activities,



particularly in the absence of effective mitigation measures. To minimize adverse effects on the environment and human health, noise management strategies will be implemented

#### **(g) Soil and Geology**

The proposed Ministry of Finance (MoF) project site is located within central Mogadishu, an area that lies on the Somali Coastal Basin, part of the broader East African sedimentary system. The geology of the region is generally characterized by Quaternary and Tertiary limestone formations, with interbedded sandstones, clayey soils and alluvial deposits, common along the coastline of southern Somalia.

Currently, the entire compound of the MoF building is paved with concrete and stone surfacing, making direct observation and assessment of surface soil characteristics unfeasible without intrusive investigation. Due to this paved nature, visible indicators of soil type, texture, or structure are absent at the immediate project footprint.

As such, a geotechnical investigation is necessary before or during the early stages of demolition and reconstruction to:

- Determine the subsurface soil bearing capacity,
- Assess potential liquefaction or settlement risks and
- Guide foundation design and earthwork planning.
- General Soil Conditions Around the Project Area

In the areas surrounding the MoF compound, particularly in adjacent open and unpaved spaces, the dominant soil types are described as:

- Sandy loam to silty sand soils with moderate drainage capacity
- Underlain by marine limestone or calcareous material, typical of coastal geomorphology;
- Relatively shallow soil horizons due to erosion and past construction activities;

- Moderate to high permeability, depending on localized compaction and vegetation cover.

The soils in this part of Mogadishu are known to have low organic matter content, limited fertility, and are prone to wind erosion when exposed. Furthermore, the proximity to the Indian Ocean and the flat topography contribute to high water table levels during the wet season, which can affect subsurface stability if not properly managed during excavation and foundation work.

#### **(h) Waste management**

The Ministry of Finance (MoF) implements a basic yet functional waste management system that aligns with its current use as an administrative and office facility. Waste generated on-site is relatively low in volume and consists mainly of office-related items such as used paper, envelopes, discarded stationery, packaging materials (including plastic wrappers and cardboard boxes) and biodegradable food waste from staff meals. The Ministry has put in place a source-segregation system, whereby waste is sorted into labeled bins based on type, typically categorized as biodegradable (food waste), recyclables (paper, plastics and packaging) and general non-recyclables. These bins are placed at convenient locations throughout the office and common areas to encourage proper use by staff. A licensed private waste collection contractor is engaged to collect and transport the waste regularly to an authorized municipal disposal site. The contractor ensures that biodegradable waste is handled in accordance with local regulations and recyclables are directed to sorting and recovery facilities where feasible. Importantly, no hazardous, medical, or industrial waste is generated on-site. While the current system is adequate for routine office operations, it will require strengthening during the demolition and reconstruction phases to accommodate construction-related debris and increased waste volumes.

### **4.4. Biological Environment**

#### **(a) Flora**

Mogadishu has experienced extensive urbanization, resulting in a notable reduction in natural vegetation across the city. The landscape is generally characterized by minimal greenery, with only a few scattered trees and isolated patches of hardy, drought-resistant plants. This trend is evident within and around the Ministry of Finance (MoF) premises, where the compound shows limited vegetation cover due to the predominance of paved surfaces and ongoing development.

The local flora primarily consists of resilient species adapted to the arid and semi-arid climatic conditions of the region. These plants are typically sparse, with low biodiversity, and rarely form dense vegetation clusters. The few existing trees provide limited shade and aesthetic value but are insufficient to contribute meaningfully to green cover or urban cooling. This situation underscores the broader ecological challenges faced in Mogadishu, including water scarcity, soil degradation, and the pressures of continuous urban sprawl, all of which constrain efforts to promote urban greening and biodiversity conservation.



Figure 8: View of Vegetation around the project site

## **(b) Fauna**

The proposed Ministry of Finance (MoF) project area in central Mogadishu is located in a heavily urbanized environment with limited natural vegetation. This reduction in greenery, caused by rapid infrastructure development and dense human settlement, has resulted in a corresponding decline in terrestrial wildlife diversity within the city limits. As a result, the area supports relatively low faunal richness, particularly in terms of medium to large mammals or reptiles that typically rely on natural habitats and cover.

Nonetheless, some avifauna (bird species) continue to thrive despite the urban setting. Common bird species observed or expected in Mogadishu and its surrounding areas include house sparrows (*Passer domesticus*), doves (*Streptopelia* spp.), crows (*Corvus* spp.), and weavers (*Ploceidae* spp.), which have adapted well to human-altered environments. These birds are often seen nesting on building rooftops, trees, or electrical infrastructure, and they feed on food scraps or insects within the city. Occasional sightings

of birds of prey, such as kestrels or small hawks, may also occur, especially in less disturbed areas.

Insects, such as ants, beetles, and mosquitoes, are also present, as are urban-adapted rodents like mice and rats. However, no rare, endangered, or ecologically sensitive species are known to inhabit the immediate vicinity of the proposed project site.

Given the limited natural habitat, any disruption to local fauna due to the proposed construction activities is expected to be minimal. However, during the construction phase, care should be taken to avoid unnecessary disturbance to existing bird nests or roosting sites, and opportunities to enhance urban biodiversity (e.g., planting trees or installing bird-friendly features) may be considered as part of environmental enhancement measures.

#### **4.5. Socio-Economic and Cultural Environment**

##### **(a) Economic activity**

The Mogadishu, Somalia's capital and most populous city, is the country's economic nerve center. Over the past decade, it has undergone significant reconstruction, spurred by domestic enterprise, diaspora investment and humanitarian presence. The area surrounding the proposed Ministry of Finance (MoF) building is centrally located and highly active in terms of economic and social engagement.

##### **(i) Trade and Commerce (Primary Economic Driver)**

Trade remains the dominant socioeconomic activity in Mogadishu, forming the lifeblood of the city's economy. The capital houses several major markets, including Bakara Market one of the largest open-air markets in the Horn of Africa, which handles goods such as food, clothing, electronics, building materials and pharmaceuticals. Much of this trade is fueled by imports through the Port of Mogadishu, which serves as the primary gateway for consumer and commercial goods entering the country.

Retail trade is also significant, with formal and informal traders operating in shops, kiosks, and roadside stalls. Women are particularly active in small-scale commerce, engaging in the sale of food items, clothing and household goods. The prevalence of mobile money platforms, particularly EVC Plus (Hormuud Telecom), has revolutionized commerce by allowing cashless, instant payments and facilitating micro-entrepreneurship in both urban and peri-urban areas (World Bank, 2022).

## **(ii) Fishing and Marine-Based Livelihoods**

Mogadishu's coastal location provides opportunities for artisanal fishing, which remains a key livelihood for some local communities, especially in coastal neighborhoods. The fishing sector, though underdeveloped, is rich in potential due to the Indian Ocean's abundant marine resources. Typical catches include yellowfin tuna, sardines, groupers and lobster.

Despite its potential, the industry faces challenges such as inadequate fishing infrastructure, limited access to international markets and competition from foreign vessels. However, ongoing donor-supported projects are working to modernize cold storage and processing to support this value chain.

## **(iii) Transport and Mobility**

Transport is integral to Mogadishu's economy. The city has a functional, though largely informal, transport system comprising taxis, bajajs (three-wheelers) and minibuses, which facilitate the movement of people and goods. Traffic congestion is common in central areas, including near the MoF compound, due to increased vehicular activity and limited road infrastructure.

The Port of Mogadishu and Aden Adde International Airport provide crucial logistical support for both commerce and humanitarian operations, reinforcing the city's role as a national and regional hub.

## **(iv) Construction and Real Estate Development**

Mogadishu has experienced a construction boom over the past decade. Driven by reconstruction needs and urban expansion, there has been a marked increase in residential, commercial and institutional building projects. The MoF area is characterized by paved compounds, new public infrastructure and multistorey buildings.

This sector provides substantial employment for both skilled and unskilled labour. However, the lack of regulatory enforcement in construction safety, environmental sustainability and land tenure security presents ongoing challenges.

### **(b) Employment & Gender Dynamics**

Unemployment is a significant socio-economic challenge in Mogadishu. According to the African Development Bank (2024), youth unemployment stood at approximately 30.1%, while the overall national unemployment rate was around 21.7%. (Somalia economic outlook, African Development Bank Group). Similarly, UN and World Bank surveys echo this situation, reporting comparable figures for urban areas. These high rates are particularly pronounced among males and young adults, reflecting the difficulties faced by a demographic under pressure to transition from education into work.

To cope, many residents depend on informal employment, such as driving motorcycle taxis (“bajajs”), street vending, domestic labour and day labour on construction sites. This informal sector offers survival-level opportunities, albeit with income instability and a lack of social protection. Women play a significant but often under-supported role in urban economies: the African Development Bank reports that women own around 45% of small and micro enterprises in Mogadishu, but face persistent barriers to growth, such as lack of collateral, restrictive loan policies, and family obligations. AECF’s “Finance for Inclusive Growth” initiative (supported by the AfDB) has made progress, disbursing over US \$10.3 million to women-led enterprises by October 2023, through women still receive less credit relative to their male counterparts.



Moreover, diaspora remittances remain central to household economies, accounting for 23–30% of Somalia’s GDP while humanitarian assistance continues to provide essential support for internally displaced persons (IDPs) and vulnerable households.

### **(c) Social Infrastructure in Mogadishu**

Mogadishu’s social infrastructure remains underdeveloped but essential for community resilience, especially in the face of rapid urbanization and displacement.

#### **(i) Education**

In the education sector, adult literacy is estimated at approximately 41%, with a notable gender disparity male literacy stands at around 54%, while female literacy remains significantly lower at about 22% (UNESCO, 2022). Encouragingly, literacy among youth (ages 15–24) has improved over the years and currently hovers around 70%, reflecting recent efforts to expand access to basic education (Somalia Ministry of Education, 2023). Despite these improvements, enrollment and school completion remain major concerns. According to UNICEF (2022), only 15–16% of school-aged children in Mogadishu are regularly enrolled in and complete primary education, with economic hardship, insecurity, and lack of infrastructure contributing to low retention rates.

#### **(ii) Health Services**

Healthcare services in Mogadishu are delivered through a combination of public hospitals, non-governmental organization (NGO)–operated health centers, and private clinics, which together provide essential services ranging from outpatient care to maternal health (WHO Somalia Country Office, 2023). In areas where government infrastructure is weak, humanitarian actors such as the Somali Red Crescent Society and HIJRA operate mobile clinics and community outreach programs to extend health services to Internally Displaced Persons (IDPs) and informal settlements (IOM Somalia, 2023).

#### **(iii) Water and Sanitation**



Water and sanitation infrastructure in Mogadishu has seen some progress, though challenges persist, especially during dry seasons. Approximately 78% of households have access to improved water sources during the rainy season; however, this drops slightly to 75% during drier periods, primarily due to seasonal variability in availability and quality (UNICEF/WHO Joint Monitoring Programme, 2023). Although central water supplies often meet WHO standards for turbidity (less than 5 NTU), residual chlorine levels in many areas are insufficient, falling below 0.02 mg/L, increasing the risk of microbial contamination (Water, Sanitation, and Hygiene in Emergencies Report, 2023). Sanitation facilities are also inadequate in many areas, especially among IDP communities where only 7% of households have access to private latrines and the majority rely on communal or makeshift facilities (IOM Somalia Displacement Monitoring Matrix, 2022). These conditions contribute to public health concerns, prompting seasonal cholera vaccination campaigns in high-risk neighborhoods, coordinated by the Ministry of Health and WHO (WHO Somalia, 2023).

#### **(iv) Religion**

Religion remains a central pillar of social life in Mogadishu. Islam is the predominant religion, and mosques, Qur'anic schools (madrassas), and Sufi brotherhoods play a key role not only in religious instruction but also in community support and service delivery (Ministry of Religious Affairs Somalia, 2022). These institutions often serve as platforms for mobilization and outreach by local NGOs and humanitarian agencies. For example, religious leaders are frequently engaged in education campaigns, public health awareness and peacebuilding activities due to their credibility and influence in the community (NGO Coordination Board Somalia, 2023).

#### **(v) Demographics & Housing**

Mogadishu, the capital of Somalia, is home to an estimated 2.4 million people, making it the most populous urban center in the country (United Nations Population Fund [UNFPA], 2022). The population is predominantly Somali, composed largely of the clan system (World Bank, 2021). The city is marked by a youthful demographic profile, with

approximately 70% of the population under the age of 30, reflecting high fertility rates and a post-conflict population rebound (UN-Habitat, 2022).

Household structures in Mogadishu tend to be large and often multigenerational, with average household sizes ranging between 5 to 7 individuals (IOM Somalia Displacement Tracking Matrix [DTM], 2023). This density places pressure on limited housing infrastructure and basic services. Much of Mogadishu's residential landscape includes a mix of formal buildings in central districts and informal settlements in peripheral areas such as Daynile, Kahda, and Garasbaley. These settlements, home to over 500,000 Internally Displaced Persons (IDPs), often lack secure tenure, access to water, electricity, and sanitation (NRC & ReDSS, 2023). Many of these residents live in makeshift shelters built from corrugated iron sheets, tarpaulins, or salvaged materials, contributing to their vulnerability during floods, evictions, and urban redevelopment.

In recent years, land ownership and housing rights have emerged as contentious issues, especially in areas affected by displacement and informal land markets. While Mogadishu's real estate market has expanded due to returning diaspora investment and construction booms, this has also led to increased land disputes and forced evictions of IDPs, exacerbating housing insecurity for the urban poor (UN-Habitat & Banaadir Regional Administration, 2022). The city lacks a comprehensive urban planning framework, making land use fragmented and poorly regulated, particularly in peri-urban districts.

Given this context, any major urban development project, such as the proposed Ministry of Finance (MoF) building, must take into account the demographic pressure, the existence of vulnerable housing arrangements nearby, and the broader urban planning challenges in order to ensure that development is inclusive, safe, and sustainable.

#### **(i) Land Use and Land Cover**

The proposed Ministry of Finance (MoF) building site is located within a highly urbanized central zone of Mogadishu, characterized by dense administrative, commercial, and

institutional land use. The immediate area is surrounded by government offices, paved roads, and a network of civic infrastructure that supports the daily operations of Somalia's federal ministries. The site itself is fully paved, with limited exposure of natural soil, which restricts direct observation of the underlying geology and native soil conditions without a formal geotechnical investigation.

Land cover in the project area is dominated by impervious surfaces, including tarmac, concrete foundations, and adjacent parking areas. Buildings in the vicinity are typically medium- to high-density masonry structures, reflecting the area's role as an administrative and financial hub. Vegetation is sparse, limited to a few scattered drought-resistant trees and ornamental plants near building perimeters. These provide minimal ecological value, contributing only slightly to shade or microclimate regulation.

#### **(d) Governance & Community Structures**

Public governance in Mogadishu operates through a hybrid system that combines formal governmental institutions with traditional and community-based authority structures. On the formal side, both municipal and federal level government agencies play active roles in urban planning, service delivery, and public administration. However, due to historical conflict and limited state reach in some areas, informal governance systems, particularly those led by clan elders, religious scholars (sheikhs), and respected community leaders, remain highly influential, especially in dispute resolution, social cohesion, and local decision-making (Bryden & Brickhill, 2010).

In parallel, non-governmental organizations (NGOs) and community-based organizations (CBOs) fill critical gaps in service provision, offering programs in education, health, livelihoods, and humanitarian support. These actors have been particularly vital in informal settlements and internally displaced persons (IDP) camps, where access to public services is limited (World Bank, 2020).

#### **(e) Cultural Heritage**

The proposed Ministry of Finance (MoF) project site is not located within or adjacent to any known or registered cultural heritage sites that require preservation. The area is primarily urban and developed, with no significant archaeological or historical monuments identified within the project footprint. However, several mosques in the broader vicinity—notably within the central districts of Mogadishu—hold religious and cultural importance to the local community. These should be respected during project implementation. Aside from these mosques, there are no places of significant cultural heritage value that are expected to be affected by the project.

**(f) Infrastructure and utility**

**(i) Energy Supply**

The proposed Ministry of Finance (MoF) project site is currently connected to Mogadishu's urban electricity grid, with power supplied by leading utility companies such as BECO and Mogadishu Power Company. These companies provide electricity to the existing MoF structures, supporting core administrative operations. However, the anticipated increase in energy demand for the new multistorey building will require a review and potential upgrade of the electrical infrastructure, including enhanced distribution capacity and safety systems.

Given the frequent power outages experienced in Mogadishu, the installation of a standby generator is necessary to ensure continuous service during grid interruptions. Furthermore, to promote sustainability, solar energy integration is strongly recommended. Incorporating solar photovoltaic (PV) panels on the building's rooftop or other structural components will reduce dependence on fossil fuel-generated electricity, lower operational costs and align with Somalia's broader climate resilience and renewable energy goals. Solar backup systems can also support critical services such as emergency lighting, communication systems and elevators during outages.

**(ii) Water Supply**

Water supply in the project area is currently provided by the Mogadishu Water Supply Company through piped connections. While this meets the existing needs of the Ministry, the expansion of infrastructure will increase water consumption substantially. Measures will need to be taken to ensure the reliability of water access throughout construction and subsequent building operation.

### **(iii) Sanitation**

Mogadishu lacks a centralized municipal sewerage system. Like most institutions in the city, the Ministry of Finance compound uses on-site septic systems to manage wastewater from restrooms and sanitation facilities. These systems are emptied and maintained periodically by licensed service providers. With the expansion of infrastructure, the septic system will require scaling up or redesigning to accommodate increased capacity. Proper siting, construction and routine maintenance will be critical to avoid contamination of soil and groundwater resources.

### **(g) Vulnerable Groups**

The area surrounding the proposed Ministry of Finance (MoF) building site in Mogadishu is home to several vulnerable groups who may be disproportionately affected by the construction-related activities. Persons with disabilities (PWDs) may face significant access challenges due to temporary road blockages, uneven pathways, or construction debris, which could restrict their safe mobility. Similarly, low-income informal vendors who operate small stalls or sell goods along nearby streets could experience temporary economic displacement. The disruption of pedestrian flow and reduced customer access may directly affect their daily income and livelihood stability.

Women, particularly those heading households or working in informal sectors such as vending or domestic labour, are likely to be affected by construction nuisances such as dust, noise, and limited sanitation access during the workday. Children and youth attending nearby schools or engaging in street-based livelihoods are also at risk from elevated noise levels, air pollution, or accidental exposure to unsafe construction zones

if proper safety measures are not implemented. Furthermore, while there may not be a high concentration of internally displaced persons (IDPs) immediately around the site, those residing in peripheral districts of the city often face limited access to public information and services, which may leave them unprepared for potential disruptions caused by the project.

#### **4.6. Occupational and Community Health and Safety**

The current Ministry of Finance (MoF) building in Mogadishu presents notable occupational health and safety concerns. The existing infrastructure is visibly aged and structurally compromised, with worn-out facilities, possible wall and ceiling cracks, outdated wiring, and poor ventilation. These conditions create an unsafe working environment for government staff still operating within the building, exposing them to potential risks such as structural failure, accidental falls, respiratory discomfort, and poor air quality. Although there are no formal records of workplace injuries, visual assessments and anecdotal accounts suggest that the current state of the building is unsuitable for long-term occupation.

In addition to risks faced by workers within the old building, the surrounding project area poses several concerns for community health and safety. The MoF compound is located in a dense urban section of Mogadishu, near administrative offices, commercial centers, and busy roads. Pedestrian movement is high throughout the day, and the area features informal trade activity with roadside vendors, small-scale food sellers, and service operators. These conditions suggest that any disruptive activity within the compound such as demolition or large-scale construction, would occur in close proximity to daily community activity.

## 4.7. Environmental and Social Screening Checklist

### 4.7.1. Site Surveys of the Project Area

Consistent with the ESIA requirements of the AfDB, the PIU E&S specialists have carried out environmental and social assessments of the demolition/construction location to predict the environmental and social risks and impacts associated with the project activities see Table 1.

The site visit conducted ensured that the project activities scheduled for implementation will be compliant with the relevant requirements of national and state-level policies, regulations, and legislation (construction and demolition standards) as well as the AfDB ISS policies.

Once we have received adequate E&S information on the area in which the project is located, including any potential environmental and social vulnerabilities of the area, and on the potential impacts that may occur and mitigation measures that might be expected to be used, the project was rated as having a Moderate Risk. For this rating, there is a chance that the project activities could cause some negative environmental and social impacts. However, these impacts are site specific and in most cases mitigation measures could be designed more readily. Hence, the project is classified as having a Moderate Risk/Category 2 as per AfDB's Operational **Safeguards** (see section 3.3).

#### **4.7.2. Environmental and Social Screening Checklist Form**

An environmental and social screening checklist was developed under this ESIA report for the project see Table 6. The purpose is to identify and assess potential negative impacts on the environment and local communities early in the project planning process. It helps project developers make informed decisions about project design, location, and mitigation measures, ultimately leading to more sustainable and responsible development practices.



Table 6: Environmental and Social Screening Checklist Form

| Appraisal Item                                            | Significance<br>(Yes/No) | Impact Level<br>(Low/Medium/High) | Mitigation<br>Measures /<br>Remarks       |
|-----------------------------------------------------------|--------------------------|-----------------------------------|-------------------------------------------|
| Loss of<br>vegetation/trees                               | No                       | N/A                               | No natural<br>vegetation on site          |
| Soil<br>erosion/siltation                                 | No                       | N/A                               | Urban terrain,<br>minimal excavation      |
| Dust and air<br>pollution (e.g. from<br>demolition)       | Yes                      | Medium                            | Water spraying,<br>masks, and<br>hoarding |
| Noise pollution<br>(machinery,<br>demolition)             | Yes                      | Medium                            | Limit working<br>hours, noise<br>barriers |
| Solid waste<br>generation                                 | Yes                      | Medium                            | Waste segregation<br>& disposal plan      |
| Liquid waste<br>generation<br>(greywater, fuel<br>spills) | Yes                      | Medium                            | Safe disposal, oil<br>spill control       |
| Water pollution<br>potential                              | Yes                      | Medium                            | Use bins, prevent<br>runoff exposure      |

| Appraisal Item                                        | Significance<br>(Yes/No) | Impact Level<br>(Low/Medium/High) | Mitigation<br>Measures /<br>Remarks  |
|-------------------------------------------------------|--------------------------|-----------------------------------|--------------------------------------|
| Climate change/GHG emissions (construction equipment) | Yes                      | Low                               | Efficient equipment, solar panels    |
| Use of non-renewable resources                        | Yes                      | Low                               | Prioritize recycled/local materials  |
| Vibration impacts on adjacent structures              | Yes                      | Low                               | Structural monitoring if needed      |
| Fire hazards during works                             | Yes                      | Medium                            | Fire extinguishers, training         |
| Electricity reliability                               | Yes                      | Medium                            | Standby generator, solar integration |
| Septic system pressure (no sewer system)              | Yes                      | Medium                            | Maintain existing septic systems     |
| Injury risks to workers                               | Yes                      | Medium                            | PPE, OHS protocols, training         |

| <b>Appraisal Item</b>                             | <b>Significance<br/>(Yes/No)</b> | <b>Impact Level<br/>(Low/Medium/High)</b> | <b>Mitigation<br/>Measures /<br/>Remarks</b> |
|---------------------------------------------------|----------------------------------|-------------------------------------------|----------------------------------------------|
| Safety risk to public/road users                  | Yes                              | Medium                                    | Signage, fencing, awareness                  |
| Risk from unstable old structure (pre-demolition) | Yes                              | Medium                                    | Phased evacuation, controls                  |
| Community health risks (dust/noise)               | Yes                              | Medium                                    | Community notices, barriers                  |
| Communicable disease spread (incl. COVID-19)      | Yes                              | Low                                       | Hygiene stations, awareness                  |
| Disruption to nearby vendors or footpaths         | Yes                              | Low                                       | Rerouting, public information                |
| Impact on informal traders, PWDs, elderly         | Yes                              | Medium                                    | Engagement, safe access provision            |
| Risk of gender-based violence/SEA/SH              | Yes                              | Medium                                    | Code of Conduct, GRM, awareness              |
| Risk of child labour                              | Yes                              | Low                                       | Age checks, clear hiring policies            |

| <b>Appraisal Item</b>                                     | <b>Significance<br/>(Yes/No)</b> | <b>Impact Level<br/>(Low/Medium/High)</b> | <b>Mitigation<br/>Measures /<br/>Remarks</b> |
|-----------------------------------------------------------|----------------------------------|-------------------------------------------|----------------------------------------------|
| labour<br>discrimination<br>(gender, clan, etc.)          | Yes                              | Medium                                    | Transparent<br>recruitment, GRM              |
| Loss of land,<br>crops, or<br>resettlement                | No                               | N/A                                       | Site already<br>government-<br>owned         |
| Cultural heritage<br>interference                         | No                               | N/A                                       | No sites identified;<br>mosques protected    |
| Increased<br>pressure on water<br>supply                  | Yes                              | Low                                       | Use municipal<br>supply, no<br>borehole      |
| Wastewater<br>disposal<br>challenges (no<br>sewer)        | Yes                              | Medium                                    | Maintain/improve<br>septic use               |
| Disruption to<br>traffic, roads, or<br>public services    | Yes                              | Low                                       | Traffic planning,<br>coordination            |
| Cumulative<br>impacts (noise,<br>dust to<br>neighborhood) | Yes                              | Medium                                    | Scheduling,<br>community<br>updates          |

| Appraisal Item                              | Significance<br>(Yes/No) | Impact Level<br>(Low/Medium/High) | Mitigation<br>Measures /<br>Remarks |
|---------------------------------------------|--------------------------|-----------------------------------|-------------------------------------|
| Employment<br>creation (positive<br>impact) | Yes                      | Positive                          | Local hiring<br>encouraged          |

## **CHAPTER 5:     STAKEHOLDER CONSULTATIONS**

### **5.1.     Introduction**

The stakeholder engagement meetings for the planned demolition and reconstruction of the Ministry of Finance (MoF) Headquarters in Mogadishu were convened on May 11th and 12th, 2025, as a critical component of the Environmental and Social Impact Assessment (ESIA) process. These meetings were held in alignment with both Somalia's national legal and regulatory frameworks and international environmental and social safeguard standards, particularly those set out by the African Development Bank (AfDB).

Public consultation and participation are legally mandated under the Federal Government of Somalia's Environmental Impact Assessment Regulations, which require that all development projects with potential environmental and social impacts must involve affected and interested stakeholders throughout the planning, design and implementation phases. These principles are echoed and reinforced by the AfDB's Integrated Safeguards System (ISS), particularly Operational Safeguard 1 on Environmental and Social Assessment, which underscores the need for timely, inclusive and transparent stakeholder engagement to enhance project quality, legitimacy and sustainability.

The purpose of these meetings was to ensure free, prior and informed consultation with communities and institutions likely to be impacted by the project, allowing them to understand, comment on and influence the project design, associated risks and mitigation measures. By upholding these principles, the Ministry of Finance affirms its commitment to participatory development, environmental accountability and social inclusion.

Led by Dr. Suleiman Sheikh, the Director General of the Ministry of Finance, the stakeholder engagement sessions brought together a diverse group of internal and external participants drawn from the Ministry and surrounding government institutions. These included technical officers, planners, environmental focal persons, safety specialists, gender and youth engagement officers, and security liaisons. Given that the

project site is located within a government precinct and is surrounded exclusively by other ministries, the engagement process was appropriately focused on institutional stakeholders rather than residential communities.

Participants provided valuable insights that were instrumental in shaping a responsive and inclusive Environmental and Social Management Plan (ESMP). Key discussions revolved around ensuring alignment with Mogadishu's urban development framework, minimizing service disruption, enhancing environmental safeguards, and integrating gender, youth, and safety considerations. Stakeholders emphasized the importance of effective relocation plans for staff, equitable local employment opportunities, strict occupational health and safety measures, and community outreach, particularly targeting women and youth for job inclusion.

These inputs, gathered through a series of focused meetings, briefings, and technical sessions, directly informed the design and implementation approach for the proposed project, ensuring that it advances not only infrastructural modernization but also institutional accountability and social responsibility. The discussion focused on:

- Project objectives and components
- Description of proposed activities
- Anticipated environmental and social impacts (positive and negative)
- Environmental and Social Management measures
- Proposed Grievance Redress Mechanism (GRM)

Some of the key steps taken in the consultation and engagement process included:

- Stakeholder consultative meetings; and
- Site Visits



## **5.2. Objectives of the Consultation Workshop**

The main goals of engaging stakeholders in the project process are as follows:

- To share clear, reliable and balanced information that enables stakeholders to gain a full understanding of the project's scope, purpose and potential impacts.
- To gather insights, perspectives and reactions from stakeholders regarding key aspects of the project.
- To ensure ongoing collaboration with stakeholders so that their concerns, expectations and complaints are continuously acknowledged and addressed throughout the project lifecycle.
- To involve stakeholders actively in planning and implementing resettlement or compensation measures where necessary.
- To foster a supportive atmosphere that promotes mutual respect, trust and smooth cooperation between the project team and all affected or interested parties.

## **5.3. Notifying Stakeholders of the ESIA**

Consultations with various lead agencies, institutions, and key stakeholders were conducted prior to and during the Environmental and Social Impact Assessment (ESIA) for the proposed demolition of the existing Ministry of Finance (MoF) headquarters and the construction of a new modern facility. These engagements were integral to building institutional and community support, gathering expert insights and identifying critical environmental and social aspects that guided the design process and informed the assessment. The consultations ensured that the ESIA was responsive to the concerns, expectations and aspirations of stakeholders, including those related to public safety, environmental sustainability, heritage preservation and future functionality of the new MoF building within its urban setting in Mogadishu.

## **5.4. Methodology and Approach**

The stakeholder engagement process for the ESIA of the proposed demolition and reconstruction of the Ministry of Finance (MoF) headquarters involved consultations with a broad spectrum of stakeholders including government entities, MoF staff, environmental experts, design consultants and potentially affected persons (PAPs). The engagement aimed to capture views and concerns related to both the demolition and construction phases of the project.

Participatory approaches were employed to ensure inclusivity, transparency and open dialogue. Key methodologies included Focus Group Discussions (FGDs) with Ministry staff and nearby community representatives which created safe spaces for participants to express concerns regarding safety, disruptions and expectations for the new facility. Additionally Key Informant Interviews (KIIs) were conducted with design consultants, environmental specialists and institutional leaders to obtain technical perspectives on project impacts and design considerations.

These participatory methods facilitated constructive dialogue, enabling stakeholders to actively contribute to the ESIA process. Structured question and answer sessions were also held during meetings to clarify technical aspects and gather consensus on mitigation strategies. The flexible and context-specific approach adopted ensured that community dynamics were respected and that all relevant concerns were integrated into the final ESIA report.

### **5.4.1. Stakeholder Engagement Strategy**

Stakeholder engagement is a critical component in identifying and understanding the environmental and social risks, potential impacts and opportunities associated with the demolition of the existing Ministry of Finance (MoF) building and the construction of a new headquarters. The project will actively involve stakeholders and maintain consistent, transparent communication throughout all phases of the project.

The core objectives of this communication and engagement strategy are:

- To provide surrounding communities, MoF staff and other stakeholders with a clear schedule of project activities along with accessible channels for feedback and input.
- To raise awareness and deepen understanding of the project's purpose, design and anticipated impacts during the demolition, construction and post-construction phases
- To publicly reinforce the commitment of the Ministry and project team to applying best practices in environmental protection and in safeguarding the health and safety of workers, visitors and the general public
- To make available a grievance redress mechanism through which stakeholders can voice complaints or concerns and receive timely, appropriate responses and corrective actions

To promote transparency and ensure information is readily available throughout the planning, demolition and construction phases, the Ministry of Finance will implement targeted communication initiatives and engagement activities in collaboration with relevant government agencies and technical teams as follows:

- Project Signboards (in English and Somali) – Informational boards will be installed at the project site and along key roads leading to the Ministry of Finance. These signboards will display essential information about the demolition and reconstruction project, including the project timeline, purpose and contact details for inquiries. The boards will also show official Ministry telephone numbers and other communication channels for stakeholder engagement.
- Website Information – The Ministry of Finance will post project updates and relevant documents on its official website. The information will be available in both English and Somali. Any major changes to the project plan, schedule, or activities will be publicly disclosed along with clear explanations of the potential environmental and social impacts.

#### **5.4.2. Sharing of Reports and Documents**

To promote transparency and ensure public access to key project information, the following documents will be made available to the public through the Ministry of Finance's official website. Hard copies will also be provided upon request through designated offices:

- **Non-Technical Summary (NTS):** A simplified overview of the project, its objectives, potential environmental and social impacts, and proposed mitigation measures, written in a format accessible to non-specialists.
- **Stakeholder Engagement Plan (SEP):** This includes the strategies and approaches used to engage stakeholders throughout the project lifecycle, as well as the Grievance Redress Mechanism, which outlines procedures for lodging and addressing concerns or complaints from stakeholders.
- **Environmental and Social Impact Statement (ESIS):** The full report detailing the assessment of potential environmental and social impacts of the demolition and construction project, along with recommended mitigation and monitoring measures.

#### **5.4.3. Grievance Mechanism**

A dedicated Grievance Mechanism will be established to address concerns and complaints arising from project-affected individuals particularly neighbors and other stakeholders. The mechanism will ensure that all grievances are addressed in a timely transparent and respectful manner. Special attention will be given to training project staff involved in grievance handling with a focus on understanding community perspectives and ensuring effective communication.

## **Potential Grievances During the Construction Phase**

Grievances may arise due to various activities and impacts associated with the demolition and construction process including:

- Accidents involving community members
- Exposure of surrounding communities to excessive dust and noise
- Security incidents or concerns in and around the project site
- Conflicts between local residents and construction workers
- Improper disposal of debris or spoil material onto private land during road access improvements or site clearance
- Slope instability and soil erosion resulting in damage to nearby properties
- Degradation of local water resources due to construction activities
- Limited job opportunities for local community members
- Concerns about unsafe or unfair working conditions for project workers
- Structural damage (e.g. cracks) to nearby houses caused by vibrations or heavy machinery

## **Potential Grievances During the Operational Phase**

During the operation of the new Ministry of Finance facility, grievances may arise due to:

- Unforeseen negative effects on surrounding properties or livelihoods (injurious affection)
- Traffic-related accidents involving project vehicles (trucks lorries and staff transport)
- Fire hazards or emergency response failures within or near the facility
- Fuel spills
- Emission of noxious fumes
- Excessive noise
- Social disruptions including population influx-related concerns

- Employee strikes or dissatisfaction due to poor working conditions and terms of employment
- Limited employment opportunities for local residents
- Reckless behavior by project-related truck drivers transporting materials

### **Project Grievance Committee (PGC)**

A Project Grievance Committee (PGC) will be established to manage and resolve complaints arising during both the construction and operational phases. The committee will comprise the MoF project manager and Community Liaison Officer, the Employer's representative and designated officials from local government authorities. The committee's mandate will conclude upon the full completion of the project.

#### **5.4.4. Grievance Register (GR)**

A Grievance Register (GR) will be maintained to record all grievances, complaints and concerns raised by stakeholders for consideration by the Ministry of Finance. This register will be located in an accessible location preferably at the project site office or nearby administrative office to allow easy access for complainants.

The register will capture the following information:

- Date of entry
- Name and contact information of the complainant
- Description of the grievance
- Complainant's signature
- Action taken or reason the grievance was not addressed
- Signatures of both the Grievance Committee and the complainant indicating closure of the grievance
- Date of resolution

#### **5.4.5. Grievance Handling Procedure**

A two-stage grievance redress process will be implemented to address complaints arising during the demolition and construction of the Ministry of Finance project.

##### **Stage 1: Internal Resolution Mechanism**

Grievances may be submitted verbally or in writing to the Project Grievance Committee (PGC) or the local administration office. Upon receiving a grievance, the PGC will review and categorize the complaint. If it is determined that the complaint does not involve a directly affected party, it may be dismissed. However, if the grievance is valid and justifiable, the Committee will investigate and seek to resolve the matter within three (3) working days.

In the course of resolving grievances, the PGC or local leadership will consult with relevant district-level technical officers as necessary such as officials from the Community Development Office, Environmental Office or Security agencies, depending on the nature of the complaint. The MoF project manager will be consulted on cases requiring higher-level oversight or technical input.

##### **Stage 2: Legal Redress through Courts**

If a grievance cannot be resolved satisfactorily through the internal mechanism, complainants have the constitutional right to seek legal redress through the formal court system. Just as external parties can lodge complaints, the Ministry of Finance also reserves the right to take action against individuals or groups that may intentionally obstruct project implementation. This includes cases such as:

- Vandalism or destruction of project signage and equipment
- Theft of project materials with the involvement or negligence of community members
- Harassment or intimidation of project workers
- Use of abusive or threatening language towards project staff

In such instances, the Ministry will pursue appropriate administrative or legal actions to protect project integrity and maintain a safe working environment.

### **5.5. Stakeholder Analysis Matrix**

A Stakeholder Analysis Matrix and mapping exercise was undertaken for the proposed demolition and reconstruction of the Ministry of Finance Headquarters Building in Mogadishu. This was conducted in line with the environmental and social assessment requirements of the Ministry of Environment and Climate Change, as well as relevant international standards, to gather stakeholder views and concerns on potential environmental and social impacts of the project.

The process considered the legal and institutional framework guiding stakeholder consultation and information disclosure, with a particular focus on ensuring meaningful public participation and transparency throughout the ESIA process. The key steps in the stakeholder engagement process included:

- Identifying and notifying relevant stakeholders about the Environmental and Social Impact Assessment (ESIA);
- Conducting both formal and informal stakeholder engagement meetings;
- Providing stakeholders with opportunities to review and comment on draft reports and project documents; and
- Documenting all feedback received and making a record of how comments and concerns were addressed, publicly available.

The stakeholder analysis exercise was conducted to assess the interests, concerns and influence of various stakeholders (excluding the project proponent) and to identify the opportunities, risks, and potential relationships that may impact or be impacted by the proposed project. This analysis informed the engagement strategy to ensure inclusive participation and to address key issues raised by affected parties and interested groups



## 5.6. Project Site Context and Stakeholder Scope

The proposed project site is situated within a high-security government zone and is surrounded exclusively by other government ministries and public institutions. There are no residential areas within the immediate vicinity of the site. As such, the stakeholder engagement process focused on internal Ministry of Finance staff and representatives from the surrounding government ministries and agencies. This targeted approach ensured that all directly affected and relevant institutional stakeholders were meaningfully consulted and their concerns adequately addressed.

Table 7: Stakeholder analysis matrix

| Stakeholder Category                                                                                                                | Interests                                                                                                                                                                                                                                           | Opportunities                                                                                                                                                                                            | Threats                                                                                                                                                                                  | Linkages/Involvement with the MoF Project                                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Central Government Entities(e.g. Ministry of Environment and Climate Change, Ministry of Public Works, Ministry of Planning)</b> | <ul style="list-style-type: none"> <li>• Oversight on policy and sectoral standards</li> <li>• Alignment with national development goals</li> <li>• Input on Environmental Management Plans</li> <li>• Issuance of permits and approvals</li> </ul> | <ul style="list-style-type: none"> <li>• Provide strategic direction and sectoral policies</li> <li>• Support ESIA review and monitoring</li> <li>• Offer technical and institutional support</li> </ul> | <ul style="list-style-type: none"> <li>• Limited technical capacity and resources for regular field monitoring</li> <li>• Bureaucratic delays affecting timelines and budgets</li> </ul> | <ul style="list-style-type: none"> <li>• Provide guiding regulations and sectoral policies</li> <li>• Issue environmental and construction approvals</li> <li>• Participate in high-level monitoring</li> <li>• Coordinate inter-ministerial input and technical support</li> </ul> |

| Stakeholder Category                                                                                                    | Interests                                                                                                                                                                                                           | Opportunities                                                                                                                                                                                                                  | Threats                                                                                                                                     | Linkages/Involvement with the MoF Project                                                                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Local Government Entities(e.g. Banaadir Regional Administration, Mogadishu Municipality, District Commissioners)</b> | <ul style="list-style-type: none"> <li>• Infrastructure development oversight (roads, waste, water)</li> <li>• Represent interests of affected persons</li> <li>• Ensure compliance within jurisdictions</li> </ul> | <ul style="list-style-type: none"> <li>• Help mobilize communities</li> <li>• Political support and local legitimacy</li> <li>• Source of local demographic data</li> <li>• Support in consultations and disclosure</li> </ul> | <ul style="list-style-type: none"> <li>- Political interference may delay decisions- May lack resources for effective engagement</li> </ul> | <ul style="list-style-type: none"> <li>• Support community engagement and awareness</li> <li>• Witness compensation and resettlement activities</li> <li>• Participate in project progress meetings</li> <li>• District Environmental Officers to co-monitor with consultants</li> </ul> |

| Stakeholder Category                            | Interests                                                                                                                                                                                                                     | Opportunities                                                                                                                                               | Threats                                                                                                                                                                                      | Linkages/Involvement with the MoF Project                                                                                                                                                                                                                                         |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Local Communities(residents, businesses)</b> | <ul style="list-style-type: none"> <li>Concern about impacts (dust, noise, access disruption)</li> <li>Interest in compensation, employment and safety</li> <li>Some livelihoods may be affected during demolition</li> </ul> | <ul style="list-style-type: none"> <li>Provide unskilled labour</li> <li>Act as information conduits</li> <li>Create local supply chain linkages</li> </ul> | <ul style="list-style-type: none"> <li>Misinformation may cause resistance- May sabotage or delay project if grievances are ignored- Risk of disruption due to unmet expectations</li> </ul> | <ul style="list-style-type: none"> <li>Need timely sensitization and grievance handling</li> <li>Eligible for compensation if adversely affected</li> <li>Can support local labour and services</li> <li>Community leaders to assist in mobilization and communication</li> </ul> |

Table 8:Stakeholders consultation

| Designation/Role                                               | Engagement Type                   | Concerns Raised / Feedback                                                                                                                                                                                             | Remarks |
|----------------------------------------------------------------|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| MoF Urban Development Liaison (Municipality link)              | MoF Stakeholder Meeting           | Welcomed the project as aligned with Mogadishu's urban planning framework. Anticipates the project will enhance institutional delivery. Stressed the importance of minimal disruption to city services.                | Noted   |
| MoF Urban Planner                                              | Internal Technical Meeting        | Confirmed alignment with the urban development master plan. Suggested inclusion of green buffers and emphasized integrated traffic/access design.                                                                      | Noted   |
| Environmental Focal Officer (MoF/Environment Ministry liaison) | Environmental Safeguards Briefing | Raised dust and noise pollution risks. Recommended continuous environmental monitoring, safe waste disposal, and PPE use.                                                                                              | Noted   |
| Community Outreach Coordinator – MoF                           | Site Engagement Activity          | Stressed engaging nearby residents to build support. Recommended prioritizing youth and women for job opportunities. Raised temporary access restriction risks.                                                        | Noted   |
| Local Resident Liaison – MoF                                   | Community Consultations           | Concerned about local employment opportunities. Raised safety issues for residents adjacent to the demolition zone.                                                                                                    | Noted   |
| District Coordination Officer – MoF                            | MoF Community Interface Session   | Asked about relocation of essential services during works. Suggested incorporating public-use facilities (e.g., waiting shelters) into new design. Raised noise/vibration concerns.                                    | Noted   |
| OHS Specialist – Ministry of Labour (consulted for MoF)        | Technical Safety Session          | Emphasized need for safety training and occupational hazard controls. Recommended routine inspection by public health officers.                                                                                        | Noted   |
| Women's Engagement Officer – MoF                               | Gender Inclusion Consultation     | Welcomed the project. Advocated for women's participation in catering and cleaning. Requested better sanitation facilities during and post-construction.                                                               | Noted   |
| Youth Representative – MoF Programs                            | Youth Engagement Session          | Pushed for youth training and on-site skilling. Requested transparency in recruitment to ensure fairness.                                                                                                              | Noted   |
| Security Liaison Officer – MoF                                 | Security Risk Briefing            | Warned of potential security threats (theft, sabotage). Recommended fencing, surveillance, local police coordination, and emergency drills.                                                                            | Noted   |
| MoF Staff Representative                                       | Internal Staff Consultation       | Expressed safety concerns for staff near construction zones. Called for regular updates and continuity of services. Supported the project's long-term benefits. Requested temporary relocation during peak demolition. | Noted   |

Table 9: Stakeholder Engagement Response Matrix

| Concern Raised                                                             | ESIA Consultant Response                                                                                                                              | MoF Representative Response                                                               | Design Consultant Response                                                                      |
|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| <b>Risk of dust and noise pollution during demolition and construction</b> | Dust suppression (e.g., regular water spraying) and noise monitoring measures will be included in the Environmental and Social Management Plan (ESMP) | MoF will ensure contractors implement mitigation measures and conduct routine inspections | Soundproof barriers and phased construction planning will be considered to minimize disturbance |
| <b>Involvement of local communities in the project</b>                     | Community engagement will continue through information sharing, grievance redress, and sensitization meetings                                         | MoF commits to recruiting at least 60% of unskilled labour from local residents           | Local participation will be prioritized in both construction and support services               |
| <b>Occupational health and safety risks</b>                                | ESMP will include strict OHS measures: PPE, site signage, first aid stations, and regular safety drills                                               | MoF will enforce contractor compliance with national OHS regulations                      | Site layout will include emergency exits, fire assembly points, and access for medical response |
| <b>Livelihood impact on street vendors and nearby informal businesses</b>  | Baseline socio-economic surveys will identify affected persons; if needed, compensation/resettlement support will be triggered                        | MoF will coordinate with the District Authority to manage temporary disruptions           | Construction staging will minimize access blockages and disruptions                             |

| Concern Raised                                                 | ESIA Consultant Response                                                                  | MoF Representative Response                                                                      | Design Consultant Response                                                                                     |
|----------------------------------------------------------------|-------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Increased traffic congestion around the MoF site               | A traffic management plan will be developed as part of the ESMP                           | MoF will work with Mogadishu Municipality to schedule works during off-peak hours                | Construction design includes clear access and exit points, temporary signage, and pedestrian safety zones      |
| Concerns over structural vibration impacts on nearby buildings | Vibration monitoring will be conducted, and heavy demolition equipment will be controlled | MoF will communicate clearly with affected building owners and provide remedies if damages occur | Demolition methods will be selected to reduce vibrations (e.g., phased/manual over full-mechanical demolition) |
| Poor information flow during the project                       | A communication plan is included in the SEP, and updates will be provided regularly       | MoF will assign a Public Information Officer to liaise with the public and media                 | Visual boards, flyers, and digital infographics will be used to communicate project phases                     |
| Inclusion of women and youth in employment                     | Gender-sensitive hiring strategies will be incorporated in the ESMP                       | MoF will require contractors to submit inclusive employment plans                                | Design of facilities will consider gender-sensitive sanitation and rest areas                                  |
| Concerns about public facilities and green areas in the design | Community recommendations will be integrated into ESIA addendum reports                   | MoF is committed to a dignified, accessible, and user-friendly public building                   | Final design includes landscaping, green zones, disability access, and potential public toilets                |

| Concern Raised                                         | ESIA Consultant Response                                                                                                                              | MoF Representative Response                                                                | Design Consultant Response                                                                                    |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| Security threats to workers, equipment, and the public | A Security Management Plan will be included in the ESMP, incorporating perimeter fencing, 24/7 surveillance, access controls, and emergency protocols | MoF will coordinate with local security agencies to ensure adequate protection of the site | The building and site will feature controlled access points, CCTV integration, security lighting, and fencing |



## Overview of Discussions

The project was broadly welcomed by stakeholders as a vital step toward modernizing public infrastructure, improving institutional functionality and aligning the capital's image with national development aspirations. However, participants raised several environmental, social and operational concerns, especially around demolition activities, construction risks and potential disruptions to daily life and livelihoods in the surrounding area.



Figure 9: Engagement with Key stakeholders



*Figure 10: Engagement with Women and Youth representatives*



*Figure 11: Engagement with key MoF staff*

## **Summary of Concerns and Risks Identified**

### **i. Air Quality and Dust Pollution**

Participants were concerned that demolition and excavation works would generate significant dust, potentially affecting public health and nearby offices. This was particularly important given Mogadishu's dry, windy conditions.

### **ii. Noise and Vibrations**

Concerns were raised about noise from heavy machinery and structural vibrations impacting nearby buildings, including older structures with weakened foundations.

### **iii. Occupational and Community Health and Safety**

Stakeholders highlighted the need for strong safety precautions, especially given the busy, densely populated location. Risks of accidents during demolition, falling debris, and construction site hazards were discussed at length.

### **iv. Employment Opportunities for Locals**

Community members representatives expressed the desire for the project to benefit local youth through job opportunities.

### **v. Traffic Congestion and Access Disruption**

Given the site's central location, increased traffic congestion, pedestrian safety and blocked access roads were identified as significant risks during the construction phase.

### **vi. Gender and Inclusion**

Women representative called for the project to ensure inclusive hiring, provide safe sanitation facilities on-site and ensure the project environment is gender-sensitive.



vii. Waste Management and Environmental Protection

Environmental officers raised issues around safe handling of demolition waste, soil erosion and risk of polluting nearby drainage and groundwater sources.

viii. Public Engagement and Communication:

Many stakeholders emphasized the need for timely information sharing throughout the project, including clear signage, updates on work schedules and a grievance mechanism.

ix. Security and Risk of Terrorism

Security stakeholders and local authorities raised serious concerns about the potential for security threats, including theft, vandalism and terrorism, especially during high-profile demolition and reconstruction activities. Recommendations included 24/7 security presence, perimeter fencing, surveillance systems, coordination with law enforcement and conducting emergency response drills for workers and nearby residents.

### **Summary Responses and commitments**

The project team, through its various stakeholders, committed to a comprehensive range of responses and mitigation measures to address environmental, social and operational concerns. On environmental and health safeguards, the ESIA Consultant committed that the contractor will conduct water spraying, install dust nets and conduct continuous air quality monitoring around sensitive zones. To reduce noise and vibration, construction activities will be restricted to daytime hours and vibration risks assessed prior to demolition. In terms of inclusion and employment, the Ministry of Finance (MoF) assured that at least 60% of unskilled labour will be sourced locally through a transparent recruitment process managed by the contractor under the supervision of the MoF's Community Liaison Officer. Design consultants committed to safety and accessibility through a Traffic Management Plan, designated pedestrian pathways, disability-friendly facilities, phased demolition to minimize disruption, scheduled rerouting of utilities to prevent service interruptions and fenced construction zones. For security and site

protection, a 24/7 security team will be deployed, perimeter lighting and collaboration with local security agencies to guard against theft, sabotage, or attacks. On waste and hazard management, all waste will be handled by a licensed waste firm, while hazardous materials such as asbestos, if any on any site, will be removed by certified specialists following strict documentation and disposal procedures. To ensure community concerns are heard and addressed, a Grievance Register will be available both onsite and online. A dedicated Project Grievance Committee (PGC) will handle complaints and provide resolutions within 3–5 working days, with feedback shared through the MoF website, local notice boards and quarterly community briefings.

### **Outcomes and Way Forward**

The consultations were constructive and provided a platform for both technical and community voices to shape the project's implementation. All feedback was documented, and commitments were made to address each concern through specific mitigation measures. There was overwhelming support for the project, with stakeholders emphasizing the importance of continued engagement, local employment, and transparency during implementation.

The integration of the stakeholder inputs and risk mitigation strategies into the Environmental and Social Management Plan (ESMP) will ensure that the project is implemented in a safe, inclusive, and sustainable manner. Continuous monitoring and adaptive management will be employed throughout the construction period to uphold these commitments.

## **Conclusion**

The stakeholder consultations were instrumental in fostering transparency, gathering critical feedback, and building local ownership of the proposed MoF building project. Through active dialogue, key risks were identified and addressed with clear commitments from all parties. The outcomes of these consultations will shape the final Environmental and Social Management Plan (ESMP) and help ensure that the project is implemented responsibly, inclusively, and with minimum negative impacts on the environment and surrounding communities.

## **CHAPTER 6: IMPACT IDENTIFICATION AND ASSESSMENT**

To identify and assess potential impacts associated with or resulting from subproject activities, the ESIA team used data collected from field consultations, site survey of the project area with regards to E&S, professional judgment, and desktop analysis to identify potential impacts and their interactions. The significance of potential impacts that may result from the proposed project was determined to assist in preparing recommendations for the proposed project E&S evaluation.

### **6.1. Impact Characterization and Evaluation**

#### **a) Impact Identification**

The process of impact identification was initiated by critically analyzing each of the planned sub-project activities at various stages—namely demolition of the existing structure, site clearance, construction of the new facility, and subsequent operation and maintenance of the building. This activity-based review was then cross-referenced with baseline environmental and social data collected from:

- Field consultations with local community members, authorities and institutions.
- On-site observations and surveys, capturing physical, ecological, and socio-economic features.
- Professional judgment, grounded in the team's multidisciplinary experience in similar urban infrastructure projects.
- Desktop reviews of relevant legislation, previous studies, satellite imagery, and GIS datasets.

The interplay between project activities and baseline environmental and social conditions allowed the ESIA team to generate a comprehensive checklist of potential impacts. These impacts span a wide range of thematic areas, including biophysical (air, water, soil, noise, vibration, etc.), ecological, health and safety, cultural heritage socio-economic well-being and institutional governance.





## **Impact Characterization**

Each potential impact identified was further characterized to determine its significance, scale, and management requirements. Impact characterization was undertaken with the objective of providing an in-depth understanding of how the proposed project activities are likely to interact with and affect various environmental and social receptors.

The characterization considered the following attributes:

Nature of Impact: Whether the impact is positive or negative.

- Type of Impact: Direct (e.g., demolition dust exposure), indirect (e.g., traffic congestion), cumulative (e.g., urban heat from multiple buildings).
- Temporal Scale: Short-term (e.g., noise during demolition), medium-term (e.g., traffic congestion during construction), or long-term (e.g., operational energy footprint).
- Spatial Scale: Localized (within project footprint), regional (affecting neighboring institutions), or systemic (urban infrastructure pressure).
- Reversibility: Whether the impact is reversible (e.g., temporary traffic disruptions) or irreversible (e.g., heritage loss).
- Frequency and Duration: Continuous, intermittent, or seasonal.
- Sensitivity of Receptors: For instance, schools and hospitals near the project site were considered highly sensitive to noise and dust.

## **b) Mitigation Measures**

Following impact identification and characterization, tailored mitigation measures were developed to address each significant negative impact. The mitigation hierarchy adopted emphasized:

- Avoidance: Where possible, impacts were prevented altogether by altering the project design or phasing (e.g., scheduling demolition outside school hours).

- Minimization: If avoidance was not feasible, measures were put in place to reduce the severity or scope of the impact (e.g., use of dust suppression technologies).
- Restoration/Rehabilitation: Actions to restore affected areas or services after temporary disturbance (e.g., landscaping after construction).
- Compensation/Offsetting: For impacts that are residual and cannot be fully mitigated (e.g., compensation for displaced informal vendors).

## **Risk Assessment/Rating**

An Environmental and Social Risk Assessment was carried out as part of the ESIA fieldwork. This involved assigning qualitative risk scores to each identified impact based on its likelihood of occurrence and severity of consequence. Risks were classified using standard ESIA rating systems and aligned with the African Development Bank (AfDB) Safeguard Policies and the World Bank's Environmental and Social Framework (ESF).

Key risk considerations included:

- High-risk issues such as hazardous waste exposure during demolition, occupational accidents, and cultural heritage disruption.
- Moderate risks such as increased traffic congestion and surface water pollution during construction.
- Low risks, such as minor aesthetic or visual disruptions during the operation phase.

Based on cumulative evaluation across environmental, health, social, and institutional dimensions, the proposed MoF Headquarters project was assigned a Medium Environmental and Social Risk rating Category 2, in accordance with AfDB classification criteria. This categorization indicates that the project has site-specific and manageable E&S risks, and will require an Environmental and Social Management Plan (ESMP) to guide mitigation implementation and monitoring.

## **6.2. Potential Positive Environmental and social Impacts**

### **6.2.1. Economic and Employment Benefits**

#### **1. Employment Creation Across Project Phases**

The proposed project will generate significant direct and indirect employment opportunities throughout its life cycle, spanning the planning, demolition, construction, equipment installation, and operational phases. This is expected to contribute meaningfully to local economic development and community empowerment.:

- i. At the planning stage, several skilled professionals have already been engaged, including architects, civil and structural engineers, Environmental and Social Impact Assessment (ESIA) consultants, quantity surveyors and project managers. Their involvement has been crucial in shaping the design, regulatory compliance and overall implementation strategy of the project.
- ii. During the demolition and construction phases, the project will create numerous employment opportunities for a wide range of skilled and unskilled workers. These include masons, electricians, plumbers, welders, carpenters, equipment operators, safety officers, cleaners and security personnel. To maximize community benefits, the contractor will be required to source a substantial proportion of unskilled and semi-skilled labour from the local population. This not only enhances local incomes but also fosters a sense of ownership and support for the project among community members.
- iii. In addition to direct employment, the project will stimulate indirect job creation through the supply chain and support services. Local businesses will benefit from increased demand for construction materials, catering services, transport logistics, equipment rentals and accommodation for non-local staff. These linkages will contribute to broader economic stimulation within Mogadishu and the surrounding districts.

#### **2. Stimulation of Local Economy**

- i. The procurement of construction materials, tools, and logistics services will stimulate demand for local goods and services.
- ii. Construction workers and project staff will spend money locally on food, accommodation, transport, and other services, generating a ripple effect across the urban economy.
- iii. Local SMEs, including hardware suppliers, transporters, and food vendors, are expected to benefit from increased business activity during the construction phase.

### **6.2.2. Institutional and Governance Strengthening**

#### **1. Enhanced Government Efficiency and Productivity**

- i. The new MoF headquarters will consolidate staff and departments currently housed in scattered or inadequate facilities into one modern, secure, and digitally integrated building.
- ii. The co-location of departments will streamline workflows, improve inter-departmental collaboration, and reduce administrative delays in public financial management.
- iii. Improved workplace ergonomics and access to modern ICT infrastructure will enhance staff morale, reduce absenteeism, and improve service delivery.

#### **2. Promotion of Good Governance and Fiscal Transparency**

- i. The new facility will provide adequate space for public service counters, training rooms, secure archiving, and ICT infrastructure to support digital financial management systems.
- ii. It will facilitate greater transparency and accountability in public financial operations through real-time data processing, reporting, and audits, enhancing Somalia's public finance architecture.

### **6.2.3. Urban Infrastructure and Environmental Sustainability**

#### **1. Modern, Sustainable Building Design**

- i. The facility will incorporate climate-resilient design features, including energy-efficient lighting, natural ventilation, water-saving fixtures, and solar panels to reduce its carbon footprint.
- ii. Stormwater drainage systems and permeable paving will minimize urban flooding and runoff.
- iii. Landscaping with native, drought-resistant vegetation will promote urban greening, reduce the heat island effect, and enhance biodiversity.

## **2. Improved Waste and Water Management**

- i. The building will feature improved waste segregation, temporary storage, and sanitation facilities, setting a model for government infrastructure.
- ii. Efficient plumbing systems will conserve water and reduce utility bills.

## **3. Reduced Urban Blight**

The demolition of the deteriorated, unsafe old building and its replacement with a new, aesthetically pleasing and functional structure will uplift the visual appeal of the city center and support broader urban regeneration.

### **6.2.4. Social and Community-Level Benefits**

#### **1. Improved Public Access and Service Delivery**

- i. The new MoF building will include accessible features (ramps, elevators, signage), ensuring that persons with disabilities and the elderly can easily access government services.
- ii. The facility will have safe, organized, and climate-controlled waiting areas for members of the public seeking services.

#### **2. Community Pride and National Symbolism**

- i. As a flagship government project, the MoF headquarters will stand as a symbol of stability, progress, and public investment in institutional development.
- ii. It may become a model for future public infrastructure investments in Somalia, promoting a culture of excellence and public-sector modernization.

#### **3. Gender and Inclusion Opportunities.**

- i. The project will implement gender-sensitive hiring practices and promote women's participation in skilled and semi-skilled roles where possible.
- ii. Training and mentorship opportunities will be provided for youth, women, and other underrepresented groups in construction-related trades and public finance.

### **6.2.5. Long-Term Strategic Benefits**

#### **1. Resilience to Climate and Security Risks**

- i. The new building will be constructed to withstand extreme weather events, including heat, rain, and high winds, contributing to the climate resilience of Somalia's public sector infrastructure.
- ii. Enhanced security features (controlled access, surveillance, fire suppression, structural integrity) will ensure safety for government staff and users of the building during emergencies.

#### **2. Increased Government Revenue and Cost Savings**

- i. The improved functionality of the MoF will indirectly enhance domestic resource mobilization through more effective tax and revenue collection mechanisms.
- ii. The energy-efficient design will reduce operational costs over time, freeing up government funds for other development priorities.

### **6.3. Potential Negative Environmental and Social Impacts**

#### **6.3.1. Negative Impacts during the Demolition Phase**

##### **1. Air Pollution (Dust Emissions)**

The demolition of the existing MoF building will release significant amounts of dust into the atmosphere. Activities such as breaking of concrete, removal of roofing materials, and transportation of debris will generate airborne particulate matter (PM10 and PM2.5). In Mogadishu's dry and windy conditions, this dust can disperse widely, reducing air quality in adjacent neighborhoods, causing respiratory discomfort among residents, and increasing the risk of conditions such as asthma and bronchitis.

##### **2. Noise Pollution and Vibrations**

Demolition activities will involve the use of heavy equipment such as jackhammers, bulldozers, and concrete crushers, which generate intense noise and vibrations. These disturbances will negatively affect nearby institutions, businesses and residential areas,

leading to temporary discomfort, communication disruption and possible hearing risks to unprotected workers. Prolonged vibration may also affect nearby structures, especially older buildings with weak foundations.

### **3. Solid Waste Generation (Demolition Debris)**

The demolition will produce large volumes of solid waste, including broken masonry, concrete slabs, metal scraps, wood, roofing sheets from old insulation or ceiling panels. Improper segregation and disposal of these wastes can result in site clutter, health risks to workers, and illegal dumping in nearby open spaces, drainage channels, or informal settlements. In Mogadishu's under-resourced waste management system, this poses a critical environmental concern.

**4. Hazardous Material Exposure- Demolition** of the old structure may expose workers and surrounding communities to hazardous materials such as asbestos, lead-based paints, and chemical residues from aged building components. Inhalation or improper handling of such materials can have long-term health effects including cancer, organ damage, and skin or eye irritation. Given the lack of specialized hazardous waste disposal systems in Somalia, safe removal and containment are a significant challenge.

### **5. Water Pollution Risk (Surface and Groundwater)**

Demolition debris and fine particles can enter nearby drains and informal stormwater channels, especially during rain events. If the demolition site is not properly contained, runoff could carry sediment, chemicals and waste into surface water systems or infiltrate shallow groundwater. This is especially dangerous in urban Mogadishu, where access to clean water is already limited and often informal.

### **6. Soil Degradation and Contamination**

The dropping and storage of demolition debris directly on the ground will likely cause soil compaction and loss of topsoil integrity. If machinery leaks oil or fuel during demolition,



soil contamination may occur. Hazardous residues from demolished materials may also seep into the soil posing long-term risks to health and ecology.

## **7. Occupational Safety and Health Risks**

The demolition phase presents substantial health and safety risks to workers. These include risk of falling debris, collapsing structures, exposure to dust and toxic substances, high noise levels, and accidents involving machinery. Without proper protective equipment and training, the workforce will be highly vulnerable to injuries and long-term health complications. Additionally, lack of site access control may put informal waste scavengers or curious bystanders at risk.

## **8. Security Threats and Site Intrusion**

Given the high-profile nature of the MoF and the context of Mogadishu, the demolition site may attract unauthorized access, opportunistic theft, or even targeted terrorism. There is also a risk of looting valuable salvage materials such as steel. Poor site security could endanger both public safety and sensitive government records or infrastructure remnants left on-site.

## **9. Community Disturbance and Accessibility Impacts**

The demolition works may obstruct normal access to roads, footpaths, and service areas near the project site. Noise, dust, and debris movement could affect daily life, particularly for commuters, local traders, and adjacent government offices. Schoolchildren, the elderly, and persons with disabilities may face increased difficulty navigating around the site, leading to social disruption and complaints from affected stakeholders.

## **10. Climate Impact (GHG Emissions)**

Demolition activities will generate greenhouse gas (GHG) emissions through the use of fossil fuel-powered machinery and vehicles. Emissions of CO<sub>2</sub>, NO<sub>x</sub>, and CH<sub>4</sub> will occur from heavy equipment, debris hauling and possible burning of demolition waste. These

emissions contribute to climate change, albeit modestly and represent a missed opportunity to incorporate low-emission, climate-smart demolition methods. Additionally, the disposal of demolition debris in unmanaged dumpsites may emit methane over time if organic waste is present.

Table 10: Demolition Phase Risk Characterization

| Impact                             | Severity | Extent         | Duration        | Reversibility        | Likelihood | Overall Risk Rating |
|------------------------------------|----------|----------------|-----------------|----------------------|------------|---------------------|
| Air Pollution (Dust Emissions)     | Moderate | Local-Regional | Short to Medium | Reversible           | High       | High                |
| Noise Pollution and Vibrations     | Moderate | Local          | Short-Term      | Reversible           | High       | High                |
| Solid Waste Generation (Debris)    | High     | Local          | Medium-Term     | Partially Reversible | High       | High                |
| Hazardous Material Exposure        | High     | Site-Adjacent  | Long-Term       | Irreversible         | Moderate   | High                |
| Water Pollution Risk               | Moderate | Local          | Medium-Term     | Partially Reversible | Moderate   | Moderate to High    |
| Soil Degradation and Contamination | Moderate | Site-Specific  | Medium to Long  | Partially Reversible | Moderate   | Moderate to High    |

| Impact                                | Severity        | Extent        | Duration        | Reversibility        | Likelihood | Overall Risk Rating |
|---------------------------------------|-----------------|---------------|-----------------|----------------------|------------|---------------------|
| Occupational Safety and Health Risks  | High            | Site-Specific | Short to Medium | Partially Reversible | High       | High                |
| Security Threats and Site Intrusion   | High            | Site-Specific | Short to Medium | Reversible           | Moderate   | Moderate to High    |
| Community Disturbance & Accessibility | Moderate        | Local         | Short-Term      | Reversible           | High       | High                |
| Climate Impact (GHG Emissions)        | Low to Moderate | Global        | Long-Term       | Irreversible         | Moderate   | Moderate            |

### **6.3.2. Negative Impact during Construction Phase**

#### **1. Loss of Vegetation**

Site clearing and ground preparation for the MoF building project may result in the loss of the few vegetation available on site, leading to a range of potential consequences including the loss of habitat for small fauna and insects, increased dust levels and surface runoff, elevated risk of soil erosion and sedimentation, reduction in carbon sequestration capacity, and visual and aesthetic degradation of the site.

#### **2. Air Pollution**

During the construction phase, significant air pollution is expected primarily from dust emissions and exhaust from heavy machinery and vehicles. Excavation and demolition of existing structures and transportation of construction materials will release particulate matter into the surrounding atmosphere. In a congested urban setting such as central Mogadishu, this dust will reduce local air quality and may aggravate respiratory issues among workers and nearby residents. Additionally, emissions from diesel-powered equipment and trucks will contribute to localized air pollution, exacerbating health concerns, particularly for vulnerable populations such as children the elderly and persons with pre-existing respiratory conditions. This impact, though moderate, warrants continuous dust suppression measures such as water spraying and covering of loose materials.

#### **2. Noise Pollution and Vibrations**

Construction activities involving excavation, concrete mixing, metal cutting and the use of heavy trucks will produce elevated levels of noise and vibrations. These disturbances will affect both construction workers and the nearby community, particularly sensitive receptors such as schools, hospitals and residential buildings. In Somalia's post-conflict context, such vibrations and loud persistent noise may also trigger anxiety among residents who associate these sounds with conflict and insecurity. Vibration-induced

structural damage to adjacent properties, especially older or poorly constructed buildings, is also a concern.

### **3. Water Pollution (Surface and Groundwater)**

The project activities, particularly excavation and the handling of fuel oils and other chemicals, pose a risk of surface and groundwater contamination. Accidental spills improper storage of hazardous materials and leakage from machinery may introduce petroleum products and other pollutants into stormwater runoff especially during rain events. The lack of robust municipal drainage and sewage systems in Mogadishu exacerbates the risk potentially affecting downstream communities that rely on shallow wells and boreholes for domestic water supply.

### **4. Increased Pressure on Urban Utilities and Infrastructure**

The construction phase will exert pressure on Mogadishu's already overstretched public utilities and infrastructure. The high demand for water and electricity during construction may lead to frequent outages or reduced service reliability for the surrounding community. Roads in the vicinity of the site may experience increased congestion and wear due to frequent movement of heavy trucks, possibly accelerating road degradation. The lack of coordinated utility service expansion in Mogadishu compounds the likelihood of service disruptions.

### **5. Soil Pollution, Compaction and Loss**

Soil degradation is anticipated through excavation, stockpiling and transportation of earth materials. Potential contamination from petroleum products and lubricants leaking from construction equipment could render some soils hazardous. Furthermore, movement of heavy equipment will compact the soil, reduce its permeability and potentially affect drainage patterns. Soil erosion from exposed surfaces, especially during rains, could result in sedimentation of nearby drainage channels.

### **6. Solid Waste Generation**

The construction phase of the Ministry of Finance MoF building project in Mogadishu will result in the generation of significant volumes of solid waste comprising both hazardous

and non-hazardous materials. Non-hazardous solid waste will primarily include excavated soil and rock packaging materials such as cement bags and plastic wrappers construction debris like broken concrete and masonry fragments and discarded construction materials including metal bars wires and wood offcuts. If not systematically collected and disposed of this waste can clutter the project site impede mobility and contribute to general environmental degradation.

Hazardous solid waste will include leftover paints and solvents, waste oil and grease from machinery and petroleum-contaminated items such as used oil filters, rags and empty lubricant containers. In addition, there is a risk of encountering construction and demolition debris that contains asbestos or lead-based paints, especially if remnants of older building materials are present. Improper handling, storage, or disposal of these materials poses a direct risk to both environmental and human health. In a city like Mogadishu, where formal waste collection and hazardous waste treatment systems are limited, such materials are often dumped illegally or burned in open areas, leading to soil and water contamination, release of toxic fumes and occupational hazards for workers and informal waste pickers. The lack of structured waste segregation and management practices exacerbates the risk, making this a notable negative impact during the construction phase.

## **7. Liquid Waste Generation**

Various construction activities at the project site will also lead to the generation of liquid waste, presenting a serious environmental and public health concern. Liquid waste will originate from several sources, including wastewater generated during the washing of concrete mixers, tools and equipment sewage and greywater from temporary sanitation facilities used by construction workers and stormwater runoff mixed with oil sediment and chemical residues from the construction site. Additionally, during rainfall events, contaminated water from exposed surfaces may be flushed into surrounding areas, especially where proper drainage infrastructure is lacking.



The absence of adequate wastewater handling systems in Mogadishu significantly increases the risk of this liquid waste infiltrating the soil or discharging into informal drainage channels and nearby water bodies. This can lead to contamination of groundwater and surface water, which some communities may rely on for domestic use. Furthermore, poor management of human waste from onsite sanitation facilities can result in the spread of communicable diseases, posing a direct threat to the health of both workers and nearby residents. In urban areas where healthcare services are already overstretched the potential for disease outbreaks due to poor waste and sanitation practices becomes a critical issue. Therefore, the generation and mismanagement of liquid waste represent a substantial environmental and social impact during the construction phase of the project.

## **8. Population Influx and Disruption to Socio-Cultural Norms**

The project will attract workers from different regions and cultural backgrounds, leading to an influx of people into the project area. This sudden demographic change may disrupt the traditional socio-cultural fabric of the surrounding communities. Potential consequences include rising demand for housing, pressure on local services and possible social tension between locals and migrant labourers. In Somalia's fragile socio-political environment, such tensions can escalate quickly if not proactively addressed through community engagement.

## **9. Occupational Safety and Health Hazards**

Construction workers face a range of occupational risks, including physical injuries from machinery exposure to harmful chemical dust inhalation and risks from working at height or in confined spaces. In Mogadishu, where enforcement of occupational health and safety regulations is generally weak the risk of accidents is amplified. Furthermore, extreme weather heat wind and lack of protective gear increase the likelihood of health complications for site workers. Adequate training, supervision and provision of personal protective equipment PPE are essential to mitigate these risks.

## **10. Community Health and Safety**

Beyond workers, the health and safety of the surrounding community is a major concern. Construction activities will generate hazards such as airborne dust, elevated noise levels, traffic accidents involving construction vehicles and unauthorized access to hazardous areas of the site. Communities located near the project site may also face reduced mobility and disruption of daily activities. In Somalia, where emergency medical response systems are limited, any incident could have severe consequences for affected residents.

## **11. Security Risks**

Given the security context in Mogadishu, the construction phase is vulnerable to security threats, including theft, vandalism and in worst cases, terrorist attacks or politically motivated sabotage. The presence of valuable machinery and large gatherings of people on-site can attract criminal elements or be targeted during episodes of instability. Furthermore, the movement of construction workers and vehicles could be perceived suspiciously by local residents or security forces potentially leading to friction. Security risks also include the potential for extortion or harassment of workers and contractors by armed groups or corrupt actors. Therefore, a robust security management plan including coordination with local law enforcement and community leaders is vital.

## **12. Climate Impact: Greenhouse Gas Emissions and Climate Change Contribution**

The construction activities associated with the redevelopment of the Ministry of Finance MoF headquarters in Mogadishu will contribute directly and indirectly to climate change through the emission of greenhouse gases GHGs. These emissions will occur at various stages of the project lifecycle, including demolition site clearance, excavation material processing and construction operations.

The construction phase will involve intensive use of fossil fuel-powered machinery, cement mixers and transport trucks. Cement production and usage a major component of modern construction is one of the highest contributors to global GHG emissions due to

the release of CO<sub>2</sub> during the calcination of limestone and from energy consumption. The importation or long-distance transportation of construction materials will add to the project's embodied carbon footprint given Somalia's heavy reliance on imported building materials and the use of older, less efficient transport vehicles.

In addition to emissions, the project may also reduce the carbon sequestration potential of the area if existing vegetation or green spaces are cleared without replacement. Moreover, the heat-retaining properties of extensive concrete and asphalt surfaces can contribute to the urban heat island effect, increasing localized temperatures and reducing the city's climate resilience.

In the absence of climate-smart design principles, sustainable construction practices and energy-efficient building systems, the overall carbon footprint of the MoF project could be substantial. Given Somalia's high vulnerability to climate impacts such as droughts coastal flooding and heat extremes any contribution to GHG emissions, however incremental, represents a significant concern and warrants appropriate mitigation monitoring and adaptation responses.

### **13. Gender-Based Violence (GBV)**

The influx of male construction workers from outside the local community, combined with limited oversight and interaction with vulnerable groups, may increase the risk of gender-based violence (GBV) in and around the project area. This includes sexual harassment, exploitation, or abuse of women and girls in nearby communities, particularly where socioeconomic vulnerabilities are high and reporting mechanisms are weak. The power imbalance between workers and local residents may exacerbate these risks, leading to long-term social harm and undermining community trust in the project.

### **14. Child labour**

Some underage children may end up working on the construction site, especially in informal roles such as manual labourers, water fetchers, or site helpers, due to poverty,

lack of schooling, and weak enforcement of labour laws. This exposes them to hazardous working conditions, interferes with their right to education, and poses serious physical, emotional, and developmental risks. The presence of children on-site also increases the project's vulnerability to reputational and legal consequences.

### **15. Risk of HIV and Sexually Transmitted Diseases (STDs)**

The influx of labourers from diverse regions, including expatriates, during the construction phase may heighten the risk of HIV and other sexually transmitted infections (STIs) in the project area. Increased interaction between incoming workers and local communities can lead to transactional sex and risky behaviors, particularly in the absence of adequate awareness, health services, and prevention measures. This poses a significant public health concern, especially for vulnerable groups such as women, girls, and adolescents, and undermines the AfDB's commitment to inclusive development, health protection, and gender equality in its infrastructure investments.

Table 11: Construction Phase risk characterization

| <b>Impact</b>                            | <b>Severity</b> | <b>Extent</b>  | <b>Duration</b> | <b>Reversibility</b> | <b>Likelihood</b> | <b>Overall Risk Rating</b> |
|------------------------------------------|-----------------|----------------|-----------------|----------------------|-------------------|----------------------------|
| Loss of Vegetation                       | Moderate        | Localized      | Long-term       | Reversible           | High              | Moderate                   |
| Air Pollution                            | Moderate        | Localized      | Short to Mid    | Reversible           | High              | Moderate                   |
| Noise Pollution & Vibrations             | High            | Localized      | Short to Mid    | Reversible           | High              | High                       |
| Water Pollution<br>(Surface/Groundwater) | High            | Localized      | Mid to Long     | Partially Reversible | Moderate          | High                       |
| Pressure on Urban Utilities              | Moderate        | Community-wide | Short-term      | Reversible           | High              | Moderate                   |
| Soil Pollution, Compaction & Loss        | Moderate        | Localized      | Mid-term        | Partially Reversible | Moderate          | Moderate                   |
| Solid Waste Generation                   | High            | Localized      | Short to Mid    | Partially Reversible | High              | High                       |

| Impact                                | Severity | Extent          | Duration           | Reversibility        | Likelihood | Overall Risk Rating |
|---------------------------------------|----------|-----------------|--------------------|----------------------|------------|---------------------|
| Liquid Waste Generation               | High     | Localized       | Short to Mid       | Partially Reversible | High       | High                |
| Population Influx & Social Disruption | Moderate | Localized       | Project Duration   | Reversible           | Moderate   | Moderate            |
| Occupational Safety & Health Hazards  | High     | Site-specific   | Throughout Project | Reversible           | High       | High                |
| Community Health & Safety             | High     | Community-wide  | Short to Mid       | Partially Reversible | High       | High                |
| Security Risks                        | High     | Project-wide    | Project Duration   | Variable             | Moderate   | High                |
| Climate Impact (GHG Emissions)        | Moderate | Regional/Global | Long-term          | Irreversible         | High       | High                |

| Impact                                               | Severity | Extent         | Duration       | Reversibility | Likelihood    | Overall Risk Rating |
|------------------------------------------------------|----------|----------------|----------------|---------------|---------------|---------------------|
| Gender-Based Violence (GBV)                          | High     | Local-Regional | Medium to Long | Difficult     | Moderate-High | High                |
| Child labour                                         | High     | Site-Specific  | Medium         | Difficult     | Moderate      | Moderate to High    |
| Risk of HIV and Sexually Transmitted Diseases (STDs) | High     | Local          | Long-Term      | Irreversible  | High          | High                |

### **6.3.3. Negative Impacts during the Operation Phase**

#### **1. Air Quality Impacts from Increased Traffic and Generator Use**

During operation, the facility will attract a high volume of vehicular traffic from employees, visitors, suppliers and service providers. This increase in traffic will elevate emissions of nitrogen oxides, carbon monoxide and particulate matter within the project area. Additionally, due to frequent electricity outages in Mogadishu, standby diesel generators are likely to be used regularly, contributing further to local air pollution. Prolonged exposure to these emissions may pose health risks, particularly for staff and nearby residents.

#### **2. Noise Pollution from Facility Operations**

Operational noise will be generated by mechanical equipment such as air conditioning units, elevators, backup generators and increased human activity around the premises. While not as intense as during construction, the cumulative noise especially from generators and HVAC systems, may cause disturbance to the nearby community and disrupt the office environment if not properly managed.

#### **3. Solid Waste Generation**

The daily activities within the MoF facility will result in continuous generation of solid waste, including paper, plastic, food waste, electronic waste and general office refuse. In the absence of effective waste segregation, recycling and disposal systems, this waste could accumulate around the facility leading to environmental pollution and pest infestations. Improper disposal of electronic waste such as old computers and batteries, can also introduce toxic substances into the environment.

#### **4. Liquid Waste and Wastewater Management**

Operational use of restrooms, kitchens and cleaning activities will produce substantial volumes of greywater and sewage. If not properly treated and discharged, the wastewater



may infiltrate the ground or flow into informal drainage channels, contaminating surface and groundwater. In a city like Mogadishu, where formal sewerage systems are limited, poor management of liquid waste can quickly become a public health hazard.

## **5. Energy Consumption and Carbon Footprint**

The MoF headquarters will require significant amounts of energy to power lighting air conditioning, elevators, computers and other office equipment. Given Somalia's dependence on diesel generators and lack of a stable national grid this energy demand will contribute to increased greenhouse gas emissions. Without the integration of renewable energy technologies or energy-efficient systems, the operational carbon footprint of the building will remain high.

## **6. Water Demand and Resource Stress**

Daily office functions and sanitation will increase water demand in a region already facing water scarcity. The reliance on groundwater through boreholes or water trucking may exacerbate depletion of local water tables. If water use is not optimized the facility risks contributing to local water stress and conflict over shared resources.

## **7. Increased Urban Traffic and Congestion**

The operation of the MoF facility will bring regular movement of employees, government officials, service vehicles and the general public. This activity will likely increase traffic congestion on surrounding roads, especially during peak hours. Limited road capacity and lack of traffic management systems in Mogadishu could lead to longer travel times, increased vehicle emissions and a higher risk of accidents.

## **8. Fire and Electrical Safety Risks**

With large-scale use of electrical systems, data centers and document storage, the risk of fire hazards becomes significant. Inadequate fire detection and suppression systems and poorly maintained wiring can lead to accidents that endanger staff lives and damage

critical government infrastructure. Regular maintenance, safety audits and emergency response plans are essential to manage these risks.

## **9. Occupational Health and Indoor Air Quality**

Poor ventilation, cleaning practices or HVAC maintenance may result in poor indoor air quality, affecting staff productivity and well-being. Exposure to indoor pollutants such as mold volatile organic compounds from paints and cleaning agents or accumulated dust can cause respiratory issues eye irritation and general discomfort. Ensuring good indoor air quality is essential for a healthy working environment.

## **10. Climate Change Impact from Building Operations**

Ongoing energy consumption, water use, solid and liquid waste generation and emissions from generators all contribute to the long-term climate impact of the building. If sustainable practices are not adopted, the cumulative contribution of the building to carbon emissions, urban heat and resource depletion will undermine Somalia's resilience to climate change. Operational policies that integrate climate-smart strategies are therefore vital.

## **11. Risk of Insecurity and Restricted Access**

As a high-profile government facility, the MoF headquarters may become a target for political demonstrations, threats or attacks. Security measures such as checkpoints, surveillance and fencing, though necessary, may limit public access and strain community relations. Balancing accessibility with security is critical to avoid marginalizing surrounding communities.

## **12. Social Inequality in Facility Access and Use**

If the facility is not inclusive in its design and management, people with disabilities the elderly and other marginalized groups may face challenges in accessing public services. This could reinforce social inequality and limit the utility of the building for all segments of

society. Ensuring universal design principles and equitable service delivery will mitigate such impacts.

Negative Impacts during the Operation Phase Risk Characterization

Table 12: Operation Phase Risk Matrix

| Impact                                        | Severity | Extent            | Duration  | Reversibility        | Likelihood | Overall Risk Rating |
|-----------------------------------------------|----------|-------------------|-----------|----------------------|------------|---------------------|
| Air Quality Impacts from Traffic & Generators | Moderate | Localized         | Long-term | Partially Reversible | High       | High                |
| Noise Pollution from Facility Operations      | Moderate | Localized         | Long-term | Reversible           | Moderate   | Moderate            |
| Solid Waste Generation                        | Moderate | Facility-wide     | Long-term | Partially Reversible | High       | Moderate to High    |
| Liquid Waste and Wastewater Management        | High     | Localized/Offsite | Long-term | Partially Reversible | High       | High                |
| Energy Consumption and Carbon Footprint       | High     | Regional/Global   | Long-term | Irreversible         | High       | High                |
| Water Demand and Resource Stress              | Moderate | Local to Regional | Long-term | Partially Reversible | High       | Moderate to High    |

| <b>Impact</b>                              | <b>Severity</b> | <b>Extent</b>   | <b>Duration</b>  | <b>Reversibility</b> | <b>Likelihood</b> | <b>Overall Risk Rating</b> |
|--------------------------------------------|-----------------|-----------------|------------------|----------------------|-------------------|----------------------------|
| Increased Urban Traffic and Congestion     | Moderate        | Community-wide  | Long-term        | Reversible           | High              | Moderate to High           |
| Fire and Electrical Safety Risks           | High            | Site-specific   | Episodic/Chronic | Partially Reversible | Moderate          | High                       |
| Occupational Health and Indoor Air Quality | Moderate        | Facility-wide   | Long-term        | Reversible           | Moderate          | Moderate                   |
| Climate Change Impact from Building Ops    | High            | Regional/Global | Long-term        | Irreversible         | High              | High                       |
| Risk of Insecurity and Restricted Access   | High            | Project-wide    | Long-term        | Variable             | Moderate          | High                       |
| Social Inequality in Access and Use        | Moderate        | Facility-wide   | Long-term        | Reversible           | Moderate          | Moderate                   |

#### 6.3.4. Residual Environmental and Social Impacts

Residual impacts are those that persist despite the application of feasible mitigation and management measures. Although reduced in severity, some level of environmental and social change is likely to remain.

Table 13: Residual Impacts

| Sn | Impact                                     | Mitigation Measures                                                       | Residual Impact                                                           | Severity        | Duration   | Reversibility        |
|----|--------------------------------------------|---------------------------------------------------------------------------|---------------------------------------------------------------------------|-----------------|------------|----------------------|
| 1  | Air Pollution from Generators and Vehicles | Use of low-emission generators, maintenance, and staff transport planning | Persistent emissions during power outages and traffic peak hours          | Low to Moderate | Long-term  | Reversible           |
| 2  | Noise Pollution                            | Acoustic insulation, restricted noisy operations, equipment maintenance   | Background mechanical noise (HVAC, generators) affecting nearby residents | Low             | Long-term  | Reversible           |
| 3  | Solid Waste Generation                     | Waste segregation, composting, regular collection                         | Residual general waste requiring disposal; risk of                        | Low to Moderate | Continuous | Partially Reversible |

| Sn | Impact                                      | Mitigation Measures                                             | Residual Impact                                                                       | Severity        | Duration     | Reversibility                        |
|----|---------------------------------------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------|--------------|--------------------------------------|
|    |                                             |                                                                 | improper downstream handling                                                          |                 |              |                                      |
| 4  | Liquid Waste and Sanitation Effluents       | Onsite treatment, septic tanks, regular maintenance             | Leakage or seepage to groundwater during rains or poor maintenance                    | Low             | Intermittent | Reversible                           |
| 5  | GHG Emissions (Climate Change Contribution) | Use of energy-efficient equipment, LED lighting, green policies | Ongoing GHG emissions from fuel use, transport, and embodied carbon in infrastructure | Moderate        | Long-term    | Irreversible (partially with offset) |
| 6  | Urban Traffic and Congestion                | Entry/exit controls, off-peak operations, internal parking      | Residual congestion from daily operations and service deliveries                      | Moderate        | Long-term    | Reversible                           |
| 7  | Fire and Safety Risks                       | Fire detection systems, trained staff, emergency response plans | Risk of fire due to malfunction or human error                                        | Low to Moderate | Episodic     | Reversible                           |

| Sn | Impact                       | Mitigation Measures                                                     | Residual Impact                                                                   | Severity | Duration  | Reversibility                  |
|----|------------------------------|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------|-----------|--------------------------------|
| 8  | Social Inequities in Access  | Inclusive design, accessible infrastructure, and grievance mechanisms   | Potential marginalization due to policy gaps or non-enforcement                   | Low      | Long-term | Reversible                     |
| 9  | Security Risks               | Surveillance, perimeter fencing, and collaboration with security forces | Threats such as vandalism or attacks remain due to Mogadishu's security context   | Moderate | Ongoing   | Reversible (context-dependent) |
| 10 | Impact on Climate Resilience | Permeable surfaces, green landscaping, and stormwater harvesting        | Increased heat island effect and reduced infiltration if greening is insufficient | Moderate | Long-term | Reversible (with upgrades)     |



## CHAPTER 7: ANALYSIS OF ALTERNATIVES

This chapter provides a comprehensive analysis of the project alternatives and the criteria used to guide the selection of the preferred option. It evaluates the proposed development in terms of key parameters, including site selection, design options, technology choices, construction techniques and phasing, as well as the anticipated environmental and social impacts across each alternative. The alternatives considered are assessed not only on their ability to meet the project's functional and economic objectives but also on their performance in minimizing adverse environmental and social effects. The evaluation framework incorporates sustainability principles, technical feasibility, cost-effectiveness, risk exposure, and compliance with relevant legal and institutional requirements.

### 7.1. No-Project Scenario

The “No Project” alternative assumes that the proposed demolition and reconstruction of the existing Ministry of Finance Headquarters will not proceed. In this case, the current structure, which is aging and no longer fit for purpose, would continue to be used. This alternative would eliminate any temporary environmental disturbances such as dust, noise, waste generation and traffic disruptions during the demolition and construction phases. However, it would also mean that structural and functional inadequacies of the current building, including overcrowding, limited space for expanding staff and services, compromised safety standards and outdated facilities, would remain unaddressed. The building may become increasingly unsafe, leading to higher maintenance costs and potential occupational health and safety incidents. The inefficiencies in service delivery would persist, negatively impacting both staff productivity and public service users. From a broader development perspective, this alternative would represent a lost opportunity to modernize essential government infrastructure. Thus, the “No Project” alternative, while seemingly risk-averse in the short term, carries greater long-term socio-economic and operational risks and is therefore not recommended.

**Conclusion:** While avoiding short-term disruptions, this option fails to address long-term safety, capacity, and operational needs. It is not considered viable.

## 7.2. Siting Alternative

An alternative considered was relocating the Ministry of Finance to a new location. This option presented potential advantages such as reduced traffic congestion in the city center and the possibility of building a larger, state-of-the-art complex on a more expansive plot. However, this alternative would require the government to acquire new land, which may lead to the displacement of existing users, legal disputes and additional costs for infrastructure development (roads, utilities, etc.). Furthermore, relocation would disconnect the MoF from other key government institutions located centrally, thereby hampering inter-ministerial coordination. Accessibility for staff and the public could also be negatively affected. The urban sprawl caused by this approach could lead to further environmental degradation in peripheral areas. These factors outweighed the potential spatial advantages, rendering relocation less favorable compared to reconstruction on the existing site.

## 7.3. Reconstruction on Existing Site

This alternative involves the full demolition of the current MoF building and the construction of a modern, mid-rise (eight-storey) concrete building at the same site. This option was chosen because it allows the Ministry to continue operating within a central and familiar government zone, avoids the cost and complexity of land acquisition and ensures institutional and public service continuity. The mid-rise design maximizes vertical space use within a dense urban setting, reducing the project's ground-level footprint while accommodating projected growth in staffing and service demands. Full demolition followed by construction ensures a safe, efficient project implementation and temporary relocation of services during this phase has been planned. Smart systems for building operations, including energy management, water efficiency, and digital security, have also been integrated to improve long-term sustainability and reduce operational costs.

**Conclusion:** This option strikes a practical balance between technical feasibility, cost-efficiency, service continuity and environmental and social impact minimization hence most viable

#### **7.4. Design Alternatives**

During project planning, both low-rise and high-rise structural options were evaluated. A low-rise design of 3–4 floors was considered for its ease of accessibility and faster construction timelines. However, this would not adequately meet the Ministry's current and future spatial requirements without significantly expanding the building's footprint, an infeasible approach in a congested urban location. On the other hand, a high-rise (above 10 stories) was ruled out due to higher construction and maintenance costs, extended timelines and increased demands on energy and safety systems. The selected mid-rise (eight-storey) option offered an optimal compromise, delivering sufficient space and functionality while maintaining manageable construction and operational requirements.

#### **7.5. Technology Alternatives**

The ESIA team also evaluated construction technology options, primarily conventional reinforced concrete versus prefabricated steel systems. Prefabricated steel systems offer faster assembly, lower labour demands and potentially lower environmental impacts in terms of reduced onsite waste. However, in the context of Somalia, sourcing prefabricated steel components and maintaining them presents significant logistical and cost-related challenges. Moreover, local contractors and workers are more familiar with concrete construction methods, ensuring greater quality control and job creation within the community. The reinforced concrete frame, though associated with higher carbon emissions due to cement production, was selected for its proven strength, durability, fire resistance and widespread local acceptance.

#### **7.6. Construction Techniques and Phasing Alternatives**

Two main sequencing approaches were considered for the project: full demolition and construction versus phased construction with partial use of the existing facility. Phased construction was evaluated as a way to reduce disruption by allowing partial operation of MoF services during construction. However, this method introduces safety risks to occupants, complicates logistics and extends the construction schedule. The selected

approach, complete demolition followed by full reconstruction, provides a clear, controlled, and efficient work environment that minimizes health and safety risks and enables better quality assurance. Temporary relocation of MoF staff and services has been incorporated into the project plan to ensure continuity of government operations during the transition period.

### **7.7. Operation and Maintenance Alternatives Considered**

For building operations, the project evaluated the use of traditional systems versus smart infrastructure. Traditional systems, which are easier to maintain and require less specialized skills, were considered but found to be outdated and inefficient in the long term. In contrast, smart building systems—featuring energy-efficient HVAC, LED lighting, water-saving fixtures and digital security align with modern public sector building standards and reduce recurring operational costs. While they require upfront investment and some staff retraining, their long-term sustainability benefits and alignment with green building goals justify their selection. These systems will enhance user comfort, reduce environmental footprint and modernize public service delivery.

### **7.8. Waste Management Alternatives Considered**

The demolition and reconstruction of the Ministry of Finance headquarters is expected to generate significant amounts of solid waste, including concrete debris, metal, wood, insulation, packaging, and general construction waste. Effective waste management is critical to minimize health, safety, and environmental impacts. Two main waste management alternatives were considered: conventional disposal and integrated waste reduction and recycling (selected option).

#### **Option A: Conventional Disposal Approach**

Under this option, all demolition and construction waste would be transported and disposed of in an approved municipal dumpsite or landfill without segregation or reuse. While this approach is straightforward and widely practiced in many urban development

projects, it poses significant environmental risks. These include accelerated landfill overloading, soil and water contamination from unmanaged debris and increased greenhouse gas emissions due to transportation and decomposition. Additionally, valuable materials such as metals, concrete and wood would be lost rather than recovered or recycled. From a regulatory and sustainability standpoint, this approach was deemed inadequate and environmentally irresponsible.

### **Option B: Integrated Waste Reduction, Reuse, and Recycling (Selected Option)**

This approach involves a structured Construction and Demolition Waste Management Plan (CDWMP), which prioritizes minimizing waste at source, sorting materials onsite and recovering reusable and recyclable items. Salvageable materials like steel, aluminum, timber and brick will be separated and sold to licensed recyclers or reused onsite where feasible. Concrete debris will be crushed and potentially used as base material for site levelling or road base aggregate. Non-recyclable waste will be transported to licensed disposal facilities and hazardous materials (e.g., asbestos, lead-based paints, electronic waste) will be handled according to national environmental regulations and best practices.

This alternative aligns with Somalia's goals of sustainable infrastructure development and resource efficiency. It also reduces environmental risks, creates green job opportunities for local waste handlers and recyclers and reinforces a circular economy model within the construction sector. As a result, the integrated waste management approach has been selected as the most viable and responsible option for the project.

## **7.9. Energy Alternatives Considered**

Energy supply and efficiency are central to the operation and sustainability of the proposed Ministry of Finance (MoF) building. As such, the ESIA considered multiple energy options with a focus on ensuring reliable, cost-effective and environmentally responsible power sources and systems. Two main alternatives were assessed: reliance on the national electricity grid only versus a hybrid energy system integrating grid power with solar photovoltaic (PV) technology.

### **Option A: Grid-Only Energy Supply**

This alternative involves full reliance on Somalia's national electricity grid and backup generators for power supply. While this option offers simplicity and ease of implementation, it presents several significant drawbacks. The national grid is characterized by frequent power outages, voltage fluctuations and inconsistent supply, which could severely disrupt the operations of a high-profile government facility. Additionally, grid-based energy generation is largely fossil-fuel based, contributing to greenhouse gas emissions and higher long-term energy costs. Dependence on diesel-powered generators during outages also increases operational expenses, air pollution and noise.

### **Option B: Hybrid Solar-Grid Energy System**

The preferred alternative is a hybrid energy system that combines power from the national grid with on-site solar photovoltaic (PV) panels and battery storage for backup. This approach enhances energy reliability, reduces dependence on fossil fuels and ensures continued operation during grid outages. Solar energy is clean, renewable and abundant in Mogadishu, making it an ideal supplementary power source. Although initial investment costs for the solar system are higher, the long-term savings on utility bills and reduced emissions make this option economically and environmentally viable. The integration of solar power also aligns with green building principles and international development goals focused on climate resilience and low-carbon infrastructure.

This hybrid system was selected for its potential to ensure uninterrupted operations of the Ministry, reduce operational carbon footprint and demonstrate leadership in sustainable public sector infrastructure.

## **7.10. Conclusion**

Demolishing the existing Ministry of Finance (MoF) building and constructing a new eight-storey facility on the same site using sustainable materials and practices has been

determined to be the most practical, environmentally responsible and socially acceptable alternative. This option effectively addresses existing structural and operational limitations, enhances safety and service delivery and minimizes environmental disruption by utilizing an already developed site.

Rebuilding on the current location significantly reduces the environmental footprint compared to constructing on a new, undeveloped site, which would likely involve land clearing, potential displacement and greater ecosystem disturbance. Moreover, maintaining the existing site supports continuity of government services and institutional presence while avoiding the legal and logistical complexities of land acquisition.

Importantly, the project site is located in a relatively secure area of Mogadishu, where security infrastructure is already established. Given the prevailing security concerns across Somalia, relocating the facility would pose heightened risks and compromise safety for staff and contractors. Therefore, any alternative involving a new site was deemed infeasible.

For these reasons, retaining the current location and adopting a full demolition and reconstruction approach is considered the most balanced and strategic choice for the project.

## **CHAPTER 8: MITIGATION MEASURES FOR POTENTIAL IMPACTS**

This chapter presents mitigation measures for the identified negative environmental and social impacts, as well as enhancement strategies for positive impacts associated with the demolition, construction and operation phases of the project. It outlines practical, site-specific actions designed to prevent, reduce, or offset adverse impacts on air quality, water resources, soil, public health, occupational safety and the socio-economic and cultural fabric of the surrounding communities. At the same time, the chapter highlights interventions aimed at maximizing project benefits such as employment creation, improved service delivery and infrastructure development. These measures are aligned with national environmental regulations, international best practices, and stakeholder concerns, ensuring the project is implemented in a socially responsible and environmentally sustainable manner.

### **8.1. Positive Impact Maximization Strategies**

This section outlines practical strategies aimed at enhancing the positive environmental and socio-economic outcomes of the proposed project. It focuses on maximizing benefits such as employment creation, skills development, improved service delivery, and strengthened local infrastructure. These strategies are designed to ensure that the project not only mitigates negative impacts but also contributes meaningfully to community development, institutional strengthening, and sustainable urban growth. By integrating these actions into the project lifecycle, the overall value and long-term benefits of the development will be significantly increase



Table 14: Positive Impact enhancement strategy

| Positive Category                                      | Impact | Specific Impact                           | Positive Impact                       | Enhancement Measures                                                                                         | Responsible Party                         | Monitoring Indicator                                |
|--------------------------------------------------------|--------|-------------------------------------------|---------------------------------------|--------------------------------------------------------------------------------------------------------------|-------------------------------------------|-----------------------------------------------------|
| <b>1. Employment &amp; Economic Benefits</b>           | 1.1    | Direct job creation across project phases | job across                            | - Enforce local hiring clauses- Maintain gender-inclusive recruitment- Monitor labour conditions             | Contractor, <b>PIU</b>                    | % local hires; Gender ratio in workforce            |
|                                                        | 1.2    | Indirect employment & SME stimulation     | Indirect employment & SME stimulation | - Promote sourcing from local SMEs- Organize vendor fairs/training                                           | <b>PIU</b> , Contractor, Procurement Unit | No. of SMEs contracted; Value of local procurement  |
|                                                        | 1.3    | Local economy stimulation                 | Local economy stimulation             | - Facilitate community vendor access- Encourage local supply chain linkages                                  | <b>PIU</b> , Contractor                   | Community business feedback; Local spending records |
| <b>2. Institutional &amp; Governance Strengthening</b> | 2.1    | Enhanced government efficiency            | Enhanced government efficiency        | - Support MoF relocation- Deliver ICT & office upgrades- Coordinate departmental integration                 | MoF, <b>PIU</b> , ICT Unit                | Transition completion reports; Staff satisfaction   |
|                                                        | 2.2    | Fiscal transparency improvement           | Fiscal transparency improvement       | - Implement digital PFM systems- Train staff on accountability tools- Enhance records and archiving capacity | <b>PIU</b> , MoF Treasury, ICT Unit       | Audit compliance; Digital system reports            |

| Positive Category                                  | Impact | Specific Impact                | Positive Enhancement Measures                                                                                   | Responsible Party                        | Monitoring Indicator                               |
|----------------------------------------------------|--------|--------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------|----------------------------------------------------|
| <b>3. Urban &amp; Environmental Sustainability</b> |        | 3.1 Green building design      | - Use eco-friendly materials- Integrate solar panels- Optimize natural ventilation & lighting                   | <b>PIU,</b> Contractor, Architect        | Sustainability certification; Energy audit reports |
|                                                    |        | 3.2 Waste and water management | - Install modern plumbing- Provide solid waste segregation bins- Set up O&M protocols                           | Contractor, <b>PIU,</b> Facility Manager | Waste disposal logs; Water use trends              |
|                                                    |        | 3.3 Urban renewal              | - Replace dilapidated structure- Implement landscaping with native plants- Improve fencing and urban aesthetics | <b>PIU,</b> Contractor, City Authorities | Beautification outcomes; Site inspection           |
| <b>4. Social &amp; Community Benefits</b>          |        | 4.1 Improved public access     | - Include ramps, signage, lifts- Ensure climate-controlled waiting areas                                        | <b>PIU,</b> Architect, MoF HR            | Accessibility audits; User feedback                |
|                                                    |        | 4.2 Civic pride & symbolism    | - Promote project through media- Use national symbols in architecture- Organize public launch events            | <b>PIU,</b> MoF PR Office                | Media engagement; Community participation          |
|                                                    |        | 4.3 Gender and inclusion       | - Ensure women's access to jobs- Link youth to apprenticeships- Enforce gender policies in hiring               | Contractor, <b>PIU,</b> HR Unit          | % female/youth workers; Inclusion metrics          |

| Positive Category                      | Impact | Specific Impact                        | Positive Impact | Enhancement Measures                                                                                         | Responsible Party                                         | Monitoring Indicator                           |
|----------------------------------------|--------|----------------------------------------|-----------------|--------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|------------------------------------------------|
| <b>5. Long-Term Strategic Benefits</b> |        | 5.1 Climate and security resilience    |                 | - Apply green design codes- Install surveillance & access control- Conduct regular security/fire drills      | <b>PIU</b> , Contractor, MoF Security                     | Resilience test reports; Security readiness    |
|                                        |        | 5.2 Revenue and cost efficiency        |                 | - Monitor energy use- Apply preventive maintenance- Invest in efficient ICT platforms                        | <b>PIU</b> , Facility Manager, MoF Finance                | Operational cost savings; ICT performance      |
| <b>6. Infrastructure Development</b>   |        | 6.1 Upgraded public infrastructure     |                 | - Upgrade nearby roads, drainage, and lighting- Coordinate utility enhancements (ICT, water, power)          | <b>PIU</b> , Ministry of Public Works, Local Authority    | No. of upgraded assets; Utility access records |
|                                        |        | 6.2 Integration with city master plans |                 | - Align project with Mogadishu urban plans- Ensure connectivity with public transport and adjacent buildings | <b>PIU</b> , Urban Planning Authority, MoF Planning Dept. | Urban integration reports; Infrastructure maps |

## 8.2. Negative Impact Mitigation Measures

This section highlights the proposed measures to avoid, minimize, or manage the potential negative environmental and social impacts identified during the demolition, construction, and operational phases of the project. The mitigation strategies are tailored to address specific issues such as air and water pollution, waste generation, noise and vibration, occupational and community health and safety, and security risks. These measures are designed to ensure compliance with national and international environmental standards while promoting sustainable and socially responsible project implementation.

### 8.2.1. Demolition Phase Environmental and Social Impact Mitigation Measures

Table 15: Demolition Phase Impact Mitigation Measures

| Negative Impact                          | Risk Characterization                                         | Risk Rating | Mitigation Measures                                                                                                                                                                                                                                                  |
|------------------------------------------|---------------------------------------------------------------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Air Pollution (Dust Emissions)</b> | Moderate likelihood, high consequence for public health       | <b>High</b> | <ul style="list-style-type: none"> <li>• Regular water spraying on dusty surfaces</li> <li>• Erect dust barriers/screens around demolition zones</li> <li>• Restrict work to low-wind periods</li> <li>• Cover trucks transporting debris with tarpaulins</li> </ul> |
| <b>2. Noise Pollution and Vibrations</b> | High likelihood, moderate consequence for sensitive receptors | <b>High</b> | <ul style="list-style-type: none"> <li>• Restrict noisy works to daytime hours</li> <li>• Use sound-insulated equipment</li> <li>• Provide ear protection to workers</li> <li>• Notify affected institutions/residents in advance</li> </ul>                         |

| Negative Impact                                      | Risk Characterization                                              | Risk Rating      | Mitigation Measures                                                                                                                                                                                                                                                                           |
|------------------------------------------------------|--------------------------------------------------------------------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3. Solid Waste Generation (Demolition Debris)</b> | High likelihood, high consequence due to poor waste infrastructure | <b>High</b>      | <ul style="list-style-type: none"> <li>• Segregate waste at source (metal, concrete, wood)</li> <li>• Engage licensed and approved waste disposal companies</li> <li>• Avoid open dumping and burning</li> <li>• Establish secure, labeled waste storage areas</li> </ul>                     |
| <b>4. Hazardous Material Exposure</b>                | Moderate likelihood, severe consequence for health                 | <b>Very High</b> | <ul style="list-style-type: none"> <li>• Conduct hazardous material audit pre-demolition</li> <li>• Use trained handlers for asbestos or lead removal</li> <li>• Provide appropriate PPE (respirators, gloves)</li> <li>• Secure hazardous waste for proper transport and disposal</li> </ul> |
| <b>5. Water Pollution (Surface and Groundwater)</b>  | Moderate likelihood, moderate consequence for water quality        | <b>Medium</b>    | <ul style="list-style-type: none"> <li>• Prevent debris from entering drains and channels</li> <li>• Install silt fences and sediment traps</li> <li>• Properly store chemicals and fuel away from drainage paths</li> <li>• Monitor run-off during rain events</li> </ul>                    |
| <b>6. Soil Degradation and Contamination</b>         | High likelihood, moderate consequence for soil and drainage        | <b>High</b>      | <ul style="list-style-type: none"> <li>• Use ground mats and containment pads under machinery</li> <li>• Maintain equipment to prevent oil/fuel leaks</li> <li>• Clean up any spills promptly</li> <li>• Avoid piling debris directly on unprotected soil</li> </ul>                          |
| <b>7. Occupational Safety and Health Risks</b>       | High likelihood, high consequence for workers                      | <b>Very High</b> | <ul style="list-style-type: none"> <li>• Enforce use of PPE (helmets, boots, goggles)</li> <li>• Conduct daily safety briefings and training</li> <li>• Install safety signage and barriers</li> <li>• Provide onsite first aid and emergency response measures</li> </ul>                    |

| Negative Impact                                    | Risk Characterization                                                          | Risk Rating      | Mitigation Measures                                                                                                                                                                                                                                                            |
|----------------------------------------------------|--------------------------------------------------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>8. Security Threats and Site Intrusion</b>      | Moderate likelihood, severe consequence in a security-sensitive area           | <b>Very High</b> | <ul style="list-style-type: none"> <li>• Fence entire site with controlled entry/exit</li> <li>• Hire 24-hour security personnel</li> <li>• Install surveillance cameras</li> <li>• Coordinate closely with local police and relevant security agencies</li> </ul>             |
| <b>9. Community Disturbance and Access Impacts</b> | High likelihood, moderate consequence on mobility and livelihoods              | <b>High</b>      | <ul style="list-style-type: none"> <li>• Provide clear alternative pedestrian routes</li> <li>• Schedule debris transport during off-peak hours</li> <li>• Use flagmen and signage for traffic control</li> <li>• Inform nearby institutions of demolition schedule</li> </ul> |
| <b>10. Climate Impact (GHG Emissions)</b>          | Certain occurrence, global consequence from fossil fuel use and waste handling | <b>Medium</b>    | <ul style="list-style-type: none"> <li>• Use fuel-efficient and well-maintained equipment</li> <li>• Minimize idling of machinery</li> <li>• Reuse salvageable materials to reduce embodied emissions</li> <li>• Avoid burning waste on-site</li> </ul>                        |

## 8.2.2. Construction Phase Environmental and social Impact Mitigation measures

Table 16: Construction Phase Impact Mitigation Measures

| Negative Impact                       | Risk Characterization                                                          | Risk Rating | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------|--------------------------------------------------------------------------------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Loss of Vegetation</b>             | Moderate likelihood, moderate consequence for biodiversity and site aesthetics | Medium      | <ul style="list-style-type: none"> <li>• Minimize clearing to essential areas only</li> <li>• Demarcate vegetation to be retained</li> <li>• Rehabilitate cleared areas with indigenous plant species</li> <li>• Implement a revegetation plan post-construction to restore green cover</li> <li>• Use native grasses and shrubs to stabilize soil and enhance biodiversity</li> </ul> |
| <b>Air Pollution</b>                  | Moderate likelihood, moderate consequence for health and air quality           | High        | Regular water spraying, covering of materials during transport, use of low-emission machinery, and periodic air quality monitoring.                                                                                                                                                                                                                                                    |
| <b>Noise Pollution and Vibrations</b> | High likelihood, moderate consequence for public and psychological well-being  | High        | Limit construction to daytime hours, use noise barriers and silencers on equipment, monitor noise levels, notify community in advance.                                                                                                                                                                                                                                                 |

| Negative Impact                                                 | Risk Characterization                                                       | Risk Rating | Mitigation Measures                                                                                                                             |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Water Pollution (Surface and Groundwater)</b>                | Moderate likelihood, severe consequence due to poor drainage infrastructure | High        | Store chemicals in secure, bunded areas, prevent fuel/oil spills, install sediment traps, and conduct regular site inspections during rainfall. |
| <b>Increased Pressure on Urban Utilities and Infrastructure</b> | High likelihood, moderate consequence on local services and infrastructure  | High        | Coordinate with utility providers, stagger high-demand activities, schedule deliveries during off-peak hours, upgrade access roads if possible. |
| <b>Soil Pollution, Compaction and Loss</b>                      | Moderate likelihood, high consequence for soil and hydrological systems     | High        | Limit movement of heavy vehicles to designated paths, regularly maintain equipment to prevent leaks, restore and vegetate exposed soils.        |
| <b>Solid Waste Generation</b>                                   | High likelihood, moderate consequence due to poor waste management systems  | High        | Segregate waste at source, provide adequate bins, partner with local recyclers, ensure daily collection and disposal at designated sites.       |
| <b>Liquid Waste Generation</b>                                  | Moderate likelihood, severe consequence for public health and water safety  | Very High   | Use mobile wastewater treatment units, construct lined drainage channels, maintain                                                              |



| Negative Impact                                                 | Risk Characterization                                                    | Risk Rating | Mitigation Measures                                                                                                                             |
|-----------------------------------------------------------------|--------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                 |                                                                          |             | sanitation facilities, prohibit discharge into open land or drains.                                                                             |
| <b>Population Influx and Disruption to Socio-Cultural Norms</b> | Moderate likelihood, moderate to high consequence for social cohesion    | Medium      | Implement a labour recruitment policy favoring locals, establish a grievance redress system, conduct awareness on cultural sensitivity.         |
| <b>Occupational Safety and Health Hazards</b>                   | High likelihood, severe consequence for worker health and safety         | Very High   | Provide PPE, conduct regular safety training and supervision, maintain equipment, install safety signage and enforce access control.            |
| <b>Community Health and Safety</b>                              | High likelihood, moderate to high consequence for local population       | Very High   | Secure the site perimeter, provide pedestrian detours and traffic marshals, hold safety briefings for local residents, install warning signage. |
| <b>Security Risks</b>                                           | Moderate likelihood, severe consequence for public safety and continuity | Very High   | Hire trained security personnel, maintain liaison with local law enforcement, install CCTV, conduct background checks for workers.              |

| Negative Impact                                                      | Risk Characterization                                                                                                                          | Risk Rating | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Climate Impact: GHG Emissions and Climate Change Contribution</b> | Certain occurrence, moderate to high consequence on climate and urban heat                                                                     | High        | Use energy-efficient equipment, source local materials, incorporate green spaces into the design, monitor and report emissions.                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Gender-Based Violence (GBV)</b>                                   | Risk of sexual exploitation, abuse, and harassment of women and girls due to the influx of male workers and weak community protection systems. | High        | <ul style="list-style-type: none"> <li>- Develop and enforce a Gender-Based Violence Action Plan (GBVAP), including a zero-tolerance policy on sexual harassment and exploitation.</li> <li>Include GBV clauses in workers' Codes of Conduct.</li> <li>- Train all workers and contractors on GBV, SEA/SH prevention and reporting.</li> <li>- Set up safe, confidential, and accessible GBV reporting mechanisms.</li> <li>- Engage local women's organizations in monitoring and survivor referral pathways.</li> </ul> |

| Negative Impact                                     | Risk Characterization                                                                                                                                                                     | Risk Rating | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Child labour</b>                                 | High likelihood of minors being engaged in construction due to poverty, lack of schooling, and weak labour law enforcement, exposing them to hazardous work and undermining their rights. | High        | <ul style="list-style-type: none"> <li>- Enforce strict age-verification procedures during recruitment.</li> <li>- Conduct awareness sessions on child labour laws for all contractors and site workers.</li> <li>- Integrate child labour clauses in contractor agreements.</li> <li>- Regularly inspect worksites for underage workers.</li> <li>- Partner with local child protection authorities and NGOs to report, refer, and follow up on any child labour cases.</li> </ul> |
| <b>HIV and Sexually Transmitted Diseases (STDs)</b> | Increased vulnerability to HIV/STIs due to transactional sex, low awareness, and lack of access to testing and prevention services among workers and community members.                   | High        | <ul style="list-style-type: none"> <li>- Conduct regular HIV/AIDS and STI sensitization and prevention campaigns for both workers and surrounding communities.</li> </ul>                                                                                                                                                                                                                                                                                                           |

| Negative Impact | Risk Characterization | Risk Rating | Mitigation Measures                                                                                                                                                                                                                                                                                 |
|-----------------|-----------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                       |             | <p>Distribute free condoms and ensure access to VCT (Voluntary Counseling and Testing) services near the site.</p> <p>- Collaborate with local health facilities or NGOs for mobile testing and awareness events.</p> <p>- Include HIV prevention measures in site health and safety protocols.</p> |

### 8.2.3. Operation Phase Environmental and social Impact Mitigation measures

Table 17: Operation Phase Impact Mitigation Measures

| Negative Impact                                                 | Risk Characterization                                                                                         | Risk Rating      | Mitigation Measures                                                                                                                                                                                 |
|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Air Quality Impacts from Increased Traffic and Generator Use | Frequent emissions from generators and vehicles; proximity to urban population increases exposure             | <b>High</b>      | Use hybrid or solar-powered generators; encourage public transport/carpooling for staff; plant vegetation buffer zones; regular maintenance of generators and vehicles.                             |
| 2. Noise Pollution from Facility Operations                     | Periodic noise from HVAC systems, generators and human traffic; moderately disruptive                         | <b>Medium</b>    | Install sound-insulated generator enclosures and vibration dampers; place equipment away from sensitive receptors; enforce quiet hours and routine maintenance.                                     |
| 3. Solid Waste Generation                                       | Continuous generation of general and electronic waste; improper disposal poses environmental and health risks | <b>High</b>      | Develop an office waste segregation policy; partner with licensed recyclers; install color-coded bins; train staff on proper disposal; maintain an e-waste take-back program.                       |
| 4. Liquid Waste and Wastewater Management                       | Improper wastewater handling may contaminate soil and water; high exposure in unsewered areas                 | <b>Very High</b> | Install onsite septic and soak-away systems or small-scale wastewater treatment units; conduct regular inspections; prohibit direct discharge into drains; promote greywater reuse for landscaping. |

| Negative Impact                                    | Risk Characterization                                                                   | Risk Rating | Mitigation Measures                                                                                                                                                              |
|----------------------------------------------------|-----------------------------------------------------------------------------------------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5. Energy Consumption and Carbon Footprint         | High energy demand due to unreliable grid; reliance on diesel generators increases GHGs | High        | Retrofit building with energy-efficient lighting, appliances and HVAC systems; integrate solar PV systems; conduct regular energy audits; automate lighting and cooling systems. |
| 6. Water Demand and Resource Stress                | Increased demand from office operations; may exacerbate local water scarcity            | High        | Install low-flow fixtures; harvest and reuse rainwater; develop a water-use policy; educate staff on conservation; monitor borehole abstraction levels.                          |
| 7. Increased Urban Traffic and Congestion          | Daily peak-time traffic; increased road wear and emissions                              | Medium      | Promote flexible work hours; provide shuttle service; construct a dedicated access road/parking area; collabourate with city traffic management authorities.                     |
| 8. Fire and Electrical Safety Risks                | High electrical load; poor systems maintenance may lead to fire or electrocution        | Very High   | Install modern fire detection/suppression systems; conduct routine electrical inspections; train staff on fire response; maintain accessible exits and extinguishers.            |
| 9. Occupational Health and Indoor Air Quality      | Poor HVAC maintenance or cleaning may degrade indoor air; health impact on staff        | High        | Maintain HVAC systems regularly; use low-VOC materials and non-toxic cleaning agents; improve natural ventilation; install air purifiers in enclosed spaces.                     |
| 10. Climate Change Impact from Building Operations | Accumulation of operational GHGs and resource use undermines national climate goals     | High        | Adopt a green building management policy; track and report GHG emissions; conduct annual climate impact assessments; integrate green landscaping to reduce heat island effect.   |

| Negative Impact                                  | Risk Characterization                                                                  | Risk Rating      | Mitigation Measures                                                                                                                                                                             |
|--------------------------------------------------|----------------------------------------------------------------------------------------|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11. Risk of Insecurity and Restricted Access     | High-profile site increases threat level; excessive security may isolate the community | <b>Very High</b> | Implement smart security (CCTV, biometric access); train security personnel on community-friendly protocols; ensure inclusive public access areas; engage local leaders on security planning.   |
| 12. Social Inequality in Facility Access and Use | Facility design and services may exclude vulnerable groups                             | <b>Medium</b>    | Apply universal design standards (ramps, braille signage, accessible washrooms); train staff in inclusive service delivery; conduct regular user feedback assessments to improve access equity. |

#### 8.2.4. Operation phase: Residual Impacts Mitigation measures

Table 18: Residual Impact Mitigation Measures

| S/N | Impact                                             | Residual Impact                                                    | Risk Characterization                    | Risk Rating | Severity        | Duration  | Reversibility | Mitigation Measures                                                                                                   |
|-----|----------------------------------------------------|--------------------------------------------------------------------|------------------------------------------|-------------|-----------------|-----------|---------------|-----------------------------------------------------------------------------------------------------------------------|
| 1   | Air Pollution from Generators and Vehicles         | Persistent emissions during power outages and peak traffic periods | Chronic, widespread, moderately frequent | Moderate    | Low to Moderate | Long-term | Reversible    | Use low-emission, hybrid/solar-powered generators; regular maintenance; promote carpooling and staff shuttle services |
| 2   | Noise Pollution (HVAC, Generators, Human Activity) | Background mechanical noise affecting nearby residents             | Localized, chronic, predictable          | Low         | Low             | Long-term | Reversible    | Install acoustic insulation; restrict noisy operations to work hours; maintain equipment                              |



| S/N | Impact                                | Residual Impact                                                                 | Risk Characterization                  | Risk Rating     | Severity | Duration     | Reversibility        | Mitigation Measures                                                                                                      |
|-----|---------------------------------------|---------------------------------------------------------------------------------|----------------------------------------|-----------------|----------|--------------|----------------------|--------------------------------------------------------------------------------------------------------------------------|
|     |                                       |                                                                                 |                                        |                 |          |              |                      | regularly; use low-noise models                                                                                          |
| 3   | Solid Waste Generation                | Non-recyclable and e-waste accumulation; risk of pest infestation and pollution | Continuous, moderate scale, manageable | Low to Moderate | Moderate | Continuous   | Partially Reversible | Enforce waste segregation, composting for organics, scheduled waste collection, secure storage for e-waste and batteries |
| 4   | Liquid Waste and Sanitation Effluents | Leakages or overflows during rains or due to poor maintenance                   | Localized, intermittent, moderate risk | Low             | Low      | Intermittent | Reversible           | Install septic tanks or onsite wastewater treatment; conduct regular desludging; connect to city                         |

| S/N | Impact                         | Residual Impact                                                              | Risk Characterization                   | Risk Rating | Severity | Duration  | Reversibility                      | Mitigation Measures                                                                                                            |
|-----|--------------------------------|------------------------------------------------------------------------------|-----------------------------------------|-------------|----------|-----------|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
|     |                                |                                                                              |                                         |             |          |           |                                    | sewer where feasible                                                                                                           |
| 5   | GHG Emissions (Climate Impact) | Ongoing GHG emissions from diesel generators, transport, and embodied carbon | Diffuse, global scale, persistent       | Moderate    | Moderate | Long-term | Irreversible (partially mitigable) | Use energy-efficient systems, LEDs, enforce green building policies, install solar panels, adopt an office climate action plan |
| 6   | Urban Traffic and Congestion   | Daily traffic bottlenecks, longer travel times, elevated emissions           | Predictable, high frequency, urban-wide | Moderate    | Moderate | Long-term | Reversible                         | Provide internal parking; optimize entry/exit points; stagger staff shifts; encourage public or shared transport use           |

| S/N | Impact                              | Residual Impact                                                              | Risk Characterization                | Risk Rating     | Severity | Duration  | Reversibility | Mitigation Measures                                                                                                                  |
|-----|-------------------------------------|------------------------------------------------------------------------------|--------------------------------------|-----------------|----------|-----------|---------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 7   | Fire and Electrical Safety Risks    | Fire hazard from overloaded circuits or poor wiring; potential document loss | Episodic, potentially severe         | Low to Moderate | Moderate | Episodic  | Reversible    | Install smoke detectors, fire extinguishers, alarms; conduct regular electrical audits; train staff on emergency response            |
| 8   | Social Inequities in Access and Use | Continued marginalization of PWDs and vulnerable users                       | Persistent, systemic, equity-related | Low             | Low      | Long-term | Reversible    | Implement universal access features (e.g., ramps, elevators); enforce inclusive service policies; install signage in local languages |

| S/N | Impact                                                | Residual Impact                                                        | Risk Characterization                      | Risk Rating | Severity | Duration  | Reversibility                     | Mitigation Measures                                                                                                            |
|-----|-------------------------------------------------------|------------------------------------------------------------------------|--------------------------------------------|-------------|----------|-----------|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| 9   | Security Risks (Terrorism/Vandalism)                  | Continued exposure to security threats due to facility profile         | Context-driven, high-impact                | Moderate    | Moderate | Ongoing   | Reversible (context dependent)    | Establish perimeter security, CCTV, and secure access zones; collaborate with national security agencies; community engagement |
| 10  | Impact on Climate Resilience (Urban Heat, Stormwater) | Increased runoff, heat island effect, reduced cooling if not mitigated | Spatially limited, progressive, slow-onset | Moderate    | Moderate | Long-term | Reversible (with future upgrades) | Install green roofs, permeable pavements, urban greening; harvest rainwater; maintain natural vegetation buffers               |



## CHAPTER 9: GRIEVANCE REDRESS MECHANISM

### 9.1. Introduction

The purpose of the Grievance Redress Mechanism (GRM) is to provide a clear, accessible, and transparent process for addressing complaints or concerns from stakeholders, including project-affected persons (PAPs), workers, and the general public, arising from the demolition, construction, and operation of the MoF project. The GRM aims to resolve grievances promptly and fairly, minimizing negative impacts and enhancing trust between the project and its stakeholders.

### 9.2. Objectives of the GRM

- To ensure timely and fair resolution of complaints.
- To promote transparency and accountability in project implementation.
- To prevent conflicts and improve relationships with the local community and other stakeholders.
- To document and track complaints, responses and resolutions effectively.

### 9.3. Principles Guiding the GRM

- **Accessibility:** The mechanism will be easily accessible to all stakeholders regardless of literacy level, gender, age, or disability.
- **Transparency:** Procedures and responsibilities will be well-communicated.
- **Confidentiality:** Complainants' identities and personal data will be protected.
- **Responsiveness:** All grievances will be acknowledged within 3 working days and resolved within a stipulated timeline.
- **Non-retaliation:** Complainants will be protected from retaliation for submitting grievances.

#### 9.4. Major Role of the Grievance Committee

The primary role of the Grievance Committee is to receive and review ethical complaints and arbitration requests. Upon initial assessment, the committee determines whether the issues raised warrant a formal hearing. If so, it facilitates a fair resolution process or escalates the matter to higher administrative levels as appropriate. Throughout the project period, the committee ensures a consistent and transparent flow of communication with all relevant stakeholders.

A dedicated Grievance Redress Committee will be formed comprising:

- Project Implementation Unit (PIU) Representative (Chair)
- MoF Representative
- Community Representative (local elder or leader)
- Women/Youth Representative
- Environmental & Social Safeguards Officer
- Contractor Representative (if relevant)

#### 9.5. Role of the Grievance Mechanism

The grievance mechanism plays a vital role in ensuring transparency, accountability, and community trust throughout the project. Its key responsibilities include:

**Establishing an Accessible Process:** Develop a clear and culturally appropriate procedure for receiving, recording and addressing complaints. The process must be easily understood and accessible to all members of the affected communities, including vulnerable groups.

**Community Awareness:** Inform affected communities about the existence, purpose, and function of the grievance mechanism during the stakeholder engagement process.

**Collaborative Resolution:** Encourage a participatory approach by involving affected communities in identifying and implementing appropriate solutions to grievances.

**Risk-Based Scaling:** Design and scale the mechanism according to the potential risks and adverse impacts associated with the project.

**Timely and Transparent Resolution:** Address complaints promptly using a transparent and easily navigable process. The mechanism should be available at no cost to complainants and must ensure protection from retaliation.

**Inclusive Participation:** Guarantee the meaningful participation of both genders and ensure the inclusion of vulnerable and marginalized groups.

**Respect for Traditional Practices:** Incorporate customary and traditional dispute resolution practices where relevant and appropriate.

**Dedicated Personnel:** Appoint qualified and experienced staff within the project team to manage the grievance process effectively, ensuring consistency and responsiveness.

**Escalation and Redress:** Establish a clear appeals or redress pathway for grievances not satisfactorily resolved, allowing for referral to an independent or external body.

**Documentation and Reporting:** Maintain accurate records of all grievances received, actions taken, and resolutions provided. Provide regular feedback to the community and generate periodic reports highlighting recurring issues and systemic concerns identified through the mechanism.



## 9.6. GRM Process Flow

| Step | Action                                                                                                                  | Responsible Party                          | Timeline                            |
|------|-------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-------------------------------------|
| 1    | <b>Submission of grievance</b> by affected person (oral, written, via phone, SMS, WhatsApp, email, or drop box at site) | Complainant                                | Ongoing                             |
| 2    | <b>Grievance recorded</b> in the Grievance Register (date, name, contact, nature of complaint)                          | Site Grievance Officer (part of PIU)       | Within 1–2 working days             |
| 3    | <b>Acknowledgement of receipt</b> of grievance to complainant                                                           | Grievance Officer / PIU                    | Within 3 working days               |
| 4    | <b>Assessment and investigation</b> (field visits, stakeholder meetings, document review if necessary)                  | PIU, Contractor, Social Safeguards Officer | Within 7–10 working days            |
| 5    | <b>Response/Resolution</b> provided to complainant (with written feedback or meeting)                                   | PIU, MoF, Local Authority (if needed)      | Within 15 working days              |
| 6    | <b>Complainant feedback and closure</b> if grievance is resolved                                                        | Complainant & PIU                          | Within 2 working days of resolution |

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|   |                                                                                                                     |                    |     |           |
|---|---------------------------------------------------------------------------------------------------------------------|--------------------|-----|-----------|
| 7 | <b>Escalation</b> if unresolved to Grievance Redress Committee or external mediation (e.g. MoF Legal Unit or court) | PIU, MoF Committee | GRM | As needed |
|---|---------------------------------------------------------------------------------------------------------------------|--------------------|-----|-----------|

### 9.7. Potential Grievance Categories

The GRM will handle:

- Dust, noise, vibration, waste, or pollution-related complaints
- Safety concerns (worker or public safety)
- Land use or access restrictions
- labour and employment grievances
- Gender-based violence or harassment (with referral to confidential GBV response services)
- Delays or miscommunication regarding project information
- Any other adverse effects or community concerns

### 9.8. Monitoring and Reporting

To ensure transparency, accountability and effectiveness of the Grievance Redress Mechanism (GRM), a structured monitoring and reporting framework will be implemented by the Project Implementation Unit (PIU), supported by the Environmental and Social Safeguards Officer.

### 9.9. Grievance Register

A **Grievance Register** will be maintained at the project site and PIU office. It will be updated continuously and will include:

- **Date of Complaint:** The day the grievance was received, which helps monitor response time and ensure timelines are met.

- **Complainant Identity:** Name and contact information (if the complainant choose to disclose their identity). Anonymous grievances will also be logged.
- **Nature of Grievance:** A clear, concise description of the issue, including whether it is environmental (e.g., noise, air quality), social (e.g., labour concerns, displacement), safety-related, or gender-based.
- **Steps Taken:** Details of the actions taken to address the grievance, including meetings held, site visits conducted, or mediation efforts initiated.
- **Responsible Officer/Party:** The person or entity assigned to resolve the complaint (e.g., Safeguards Officer, Contractor, MoF official).
- **Resolution Status:** Whether the complaint is:
  - Resolved and closed,
  - In progress (under investigation or awaiting feedback), or
  - Escalated to the Grievance Redress Committee (GRC) or legal recourse.
- **Timeframe:** Record of how long it took to resolve or escalate the issue.

#### 9.10. Monthly Monitoring Reports

The PIU, through the Environmental and Social Safeguards Officer, will generate **monthly grievance reports**. These will include:

- Summary of grievances received and their categorization.
- Resolved and unresolved cases.
- Key trends (e.g., repeated complaints on waste management or labour conditions).
- Recommendations for proactive mitigation measures.

- Action points and follow-ups for unresolved or systemic grievances.

These reports will be shared with:

- The Ministry of Finance (MoF),
- Relevant local authorities (municipality or regional offices),
- Development partners (if applicable),
- Stakeholder forums or community liaison representatives (if appropriate for public disclosure).

### **9.11. Continuous Improvement**

By analyzing grievance trends over time, the PIU and project partners will identify:

- Gaps in communication or stakeholder engagement.
- Recurring technical or operational issues.
- Potential policy or procedural weaknesses.

This analysis will inform ongoing improvements in project design, stakeholder engagement strategy, environmental and social mitigation, and overall risk management.

### **9.12. Appeals and Legal Recourse**

Despite the project's commitment to resolving grievances amicably and at the community level, some complaints may remain unresolved to the satisfaction of the complainant. To ensure justice, equity, and access to higher levels of redress, the following escalation channels are available:

#### **1. Appeal to the Ministry of Finance or an Independent Mediator**

If a complainant is dissatisfied with the resolution provided by the PIU or Grievance Redress Committee (GRC), they have the right to:

- File a **formal written appeal** to the Office of the Director General or the Public Complaints Division of the Ministry of Finance.
- Request an **independent mediator or ombudsperson** (where available) to facilitate dialogue between parties and propose a neutral resolution.

Appeals to the MoF will be logged, tracked and responded to within a defined period (normally 15 working days).

## **2. Legal Recourse through Somalia's Judiciary**

As a final step, the complainant may seek redress through Somalia's **formal legal system**. This may involve:

- Filing a case with a competent court of law (e.g., local civil court or administrative tribunal).
- Engaging legal aid or community-based legal advisors if necessary.
- Requesting legal intervention in cases involving human rights violations, land disputes, labour violations, or gender-based violence.

## **CHAPTER 10: ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN**

### **10.1. Introduction**

The Environmental and Social Management and Monitoring Plan (ESMMP) for the proposed demolition and reconstruction of the Ministry of Finance (MoF) Headquarters in Mogadishu outlines the systematic approach to managing and mitigating potential environmental and social impacts associated with the project across all phases: demolition, construction and operation.

Environmental and social management focuses on the implementation of practical measures to eliminate, minimize, or mitigate adverse impacts to levels that are environmentally acceptable and socially responsible. The plan provides a structured framework for ensuring that all mitigation measures identified in the Environmental and Social Impact Assessment (ESIA) are properly implemented, monitored, and evaluated throughout the lifecycle of the project.

Monitoring, in this context, is a continuous and long-term process that commences at the pre-construction phase and extends throughout construction and operation. Its primary objective is to:

- Establish environmental and social performance benchmarks;
- Track the effectiveness of mitigation measures;
- Verify compliance with national regulations and donor safeguard requirements;
- Detect unforeseen or cumulative impacts early for timely corrective action.

Specifically, the ESMMP aims to:

- Ensure that all environmental and socio-economic mitigation measures proposed for the MoF project are fully integrated into the project implementation and operation phases.



- Provide clear institutional arrangements and responsibilities for monitoring activities;
- Facilitate adaptive management by allowing for mid-course adjustments when necessary;
- Enhance transparency and accountability in environmental and social risk management.

The ESMMP developed for the MoF Headquarters project includes key components such as impact-specific mitigation measures, performance indicators, responsible institutions, timelines, estimated costs, and monitoring mechanisms. This integrated approach supports the project's compliance with Somalia's environmental regulations, African Development Bank safeguard policies, and international best practices in infrastructure development.

## **10.2. Purpose and Scope**

The purpose of the Environmental and Social Management and Monitoring Plan (ESMMP) is to ensure that both the biophysical and social environments are safeguarded from the potential adverse impacts of the proposed Ministry of Finance (MoF) Headquarters project. The ESMMP serves as a practical reference and guidance tool for all stakeholders involved in the implementation, supervision and monitoring of environmental and social safeguards throughout the entire project lifecycle. It outlines the responsibilities, procedures and mitigation measures necessary to minimize negative impacts, enhance positive outcomes and ensure compliance with regulatory and donor requirements.

## **10.3. The Scope of ESIA**

The Environmental and Social Management and Monitoring Plan (ESMMP) covers all activities to be undertaken under the proposed demolition and reconstruction of the Ministry of Finance Headquarters. It addresses all significant adverse environmental and social impacts anticipated during the implementation of the project. The ESMMP clearly

outlines the parties responsible for environmental and social management and monitoring, the roles to be played by each party, the general requirements for environmental management and monitoring and provisions for decommissioning, restoration and rehabilitation. It also includes indicative cost estimates to facilitate budgeting for the effective implementation of mitigation and monitoring measures.

#### 10.4. Key Elements of the ESMP

The ESMP addresses the following key components:

- **Mitigation Measures** for environmental and social impacts during demolition/construction and operational phases .
- **Institutional Arrangements**, including the roles and responsibilities of implementing agencies, focal persons and other stakeholders.
- **Monitoring Mechanisms**, to track the implementation of mitigation measures.
- **Capacity Building**, training programs and awareness activities.
- **Grievance Redress Mechanism (GRM)** to resolve complaints from project-affected people (PAPs) and other stakeholders.
- **Stakeholder Consultation and Engagement**

#### 10.5. Stakeholders in the implementation of ESMP

The implementation of this ESMMP requires the involvement of several stakeholders, each fulfilling a distinct yet essential role in ensuring effective environmental and social management throughout the lifecycle of the project. The key stakeholders include the Directorate of Environment and Climate Change under the Office of the Prime Minister (as the environmental regulator), the Ministry of Finance (as the project developer), the AFDB and the Mogadishu

##### 10.5.1. Directorate of Environment and Climate Change (DECC)

The Directorate of Environment and Climate Change (DECC), under the Office of the Prime Minister, is the designated national authority responsible for reviewing and approving the Environmental and Social Impact Study (ESIS) and the Environmental and Social Management and Monitoring Plan (ESMMP) contained therein. The DECC holds

the overall responsibility for ensuring that the project developer (Ministry of Finance), the contractor, and associated stakeholders comply with the environmental conditions set out in the approved ESIS and those attached to the environmental clearance certificate. Municipal Authority and the surrounding community (as the primary beneficiaries).

#### **10.5.2. Funder (African Development Bank - AfDB)**

The African Development Bank (AfDB), as the project funder, shall play an oversight and support role throughout the implementation of the Environmental and Social Management and Monitoring Plan (ESMMP). Its responsibilities include:

- Providing overall supervision and technical support to ensure compliance with AfDB environmental and social safeguard policies.
- Recommending additional measures to strengthen the project's environmental and social management framework and enhance implementation performance.
- Monitoring and supervising the application of the ESMMP and the incorporation of its recommendations into project implementation activities.

#### **10.5.3. The Developer (Ministry of Finance - MoF)**

The Ministry of Finance (MoF), as the project developer, shall be responsible for the following:

- Collating environmental baseline data relevant to the proposed MoF headquarters site.
- Analyzing potential environmental and social impacts resulting from the reconstruction and operational activities.
- Taking full accountability for the environmental and social impacts of the project, and ensuring that these impacts are effectively managed.
- Ensuring that all project activities are implemented in accordance with best practices and the mitigation guidelines outlined in the ESMMP.

- Identifying and engaging all stakeholders involved in environmental and social matters related to the project.
- Overseeing the implementation and monitoring of all environmental and social mitigation measures throughout the project lifecycle.
- Developing, coordinating, and ensuring implementation of the social aspects of the ESMMP, including grievance redress, stakeholder engagement, and social inclusion.
- Conducting impact evaluations and beneficiary assessments to measure project outcomes.
- In accordance with Somalia's National Environmental Audit Guidelines, submitting the first Environmental Audit Report to the Ministry of Environment and Climate Change (or relevant regulatory authority) not less than twelve months and not more than thirty-six months from the commencement of the project.

#### **10.5.4. The Contractor**

The contractor will be procured through a transparent and competitive bidding process overseen by the Ministry of Finance (MoF), with support from the relevant procurement authority.

- The contractor will be directly responsible for implementing the Environmental and Social Management and Monitoring Plan (ESMMP) on behalf of the funder (AfDB) and the Ministry of Finance (beneficiary and developer).
- The contractor shall appoint a dedicated site environmental and social officer to oversee compliance with the ESMMP, provide guidance to site personnel, and ensure all mitigation measures are effectively executed.
- The contractor must adhere strictly to Bill of Quantities (BOQ) specifications in the procurement of construction materials and works.
- The contractor shall prepare and implement a Construction Environmental and Social Management Plan (CESMP), along with any other required sub-plans, in line with the main ESMMP and the environmental approval conditions.

#### **10.5.5. Project Implementation Unit (PIU)**

A dedicated Project Implementation Unit (PIU) shall be established within the Ministry of Finance to oversee day-to-day project execution and ensure alignment with the approved ESMMP.

- The PIU will coordinate all project activities, including procurement, supervision, reporting, and stakeholder engagement.
- It will monitor contractor compliance with the ESMMP and ensure that all mitigation and monitoring measures are timely and properly implemented.
- The PIU will serve as the central liaison between the Ministry of Finance, the funder (AfDB), regulatory authorities, and affected communities.
- The unit will ensure environmental and social safeguards are mainstreamed into all aspects of the project lifecycle and will produce periodic environmental and social performance reports.

#### **10.6. Capacity Building and Awareness Training**

To ensure effective implementation of the Environmental and Social (E&S) requirements for the demolition and construction phases of the project, it is essential to build adequate awareness and capacity around the Environmental and Social Management Plan (ESMP) and the measures outlined in the project's Environmental and Social Impact Assessment (ESIA) report.

The Project Implementation Unit (PIU) will be responsible for ensuring that all key stakeholders, including contractors, subcontractors, project engineers, E&S specialists, and other implementing partners, fully understand the ESMP and their respective roles in meeting its E&S requirements. This understanding is critical to achieving a safe, efficient and environmentally sound completion of all project activities.

To this end the PIU will organize structured capacity-building sessions and training workshops focused on E&S risk and impact management. These will include the

establishment of an E&S management system and tailored training on the African Development Bank's (AfDB) Integrated Safeguards System (ISS) and relevant Environmental Health and Safety (EHS) Guidelines.

#### **10.7. Capacity Building and Training for Contractors' Employees**

To ensure the effective implementation of the Environmental and Social Management Plan (ESMP) for the MoF Headquarters Demolition and Reconstruction Project, the Contractor and sub-contractors will be required to develop a comprehensive in-house training and awareness program. This program will be aimed at enhancing the capacity of their workforce to carry out site activities in full compliance with the ESMP provisions.

The Contractor must identify specific training needs among the workforce and develop a targeted training program aligned with their respective roles in the mitigation measures. This includes, but is not limited to, training on solid and hazardous waste management, environmental health and safety (EHS) practices, proper use of personal protective equipment (PPE) and the administration of basic first aid in case of injuries. The contractor will also be expected to allocate sufficient resources and institute support mechanisms necessary to ensure the ESMP is fully operational on-site.

The Project Implementation Unit (PIU), on behalf of the Ministry of Finance, will be responsible for verifying that the contractor has undertaken the required training and capacity-building activities prior to the commencement of any site works. In parallel, awareness-raising activities will be conducted targeting both project staff and the surrounding community before any physical works begin at the project location.

In addition to contractor-led training, the PIU will organize and facilitate a comprehensive E&S training session for project stakeholders. This will include MoF staff involved in the project, supervising engineers, contractor safeguards officers and representatives from relevant government institutions. The objective is to improve the technical knowledge and practical skills necessary for effective ESMP implementation throughout both the demolition and construction phases of the project.

Given that the same stakeholders will be engaged throughout the lifecycle of the project, this training will be conducted as a single, consolidated session designed to cover all project activities. The content will be tailored to the varying levels of technical capacity among participants, ensuring that both frontline implementers and supervisory personnel gain practical, policy-aligned skills.

The training will include hands-on components focused on the use of the Environmental and Social Management and Monitoring Plans. It will also cover other thematic areas within the ESMP and broader Environmental and Social Safeguards Policies, with reference to AfDB's Integrated Safeguards System (ISS) and national regulatory requirements.

Ultimately, this capacity-building effort is aimed at ensuring that all project actors, especially PIU representatives, the contractor's team and supervising engineers, understand the critical components of the ESMP and are well-prepared to manage environmental and social risks and impacts effectively, efficiently and in compliance with both national and international standards.



## 10.8. Environmental and Social Management and Monitoring Plan (ESMMP)

Table 19:ESMMP

| Project Phase | Activity                                           | Potential Impact               | Risk Characterization                       | Impact Rating | Mitigation / Enhancement Measure                                             | Timing                  | Monitoring Indicators                         | Responsible Party          | Source of Funds |
|---------------|----------------------------------------------------|--------------------------------|---------------------------------------------|---------------|------------------------------------------------------------------------------|-------------------------|-----------------------------------------------|----------------------------|-----------------|
| Demolition    | Building demolition (breaking, removal, transport) | Air Pollution (Dust Emissions) | Dust dispersion due to dry/windy conditions | Moderate      | Use of water spraying, debris covering, rapid waste removal, PPE for workers | Daily during demolition | Ambient air quality, worker health complaints | Contractor, PIU, ESMP Team | Project Budget  |
| Demolition    | Use of heavy equipment (jackhammers, bulldozers)   | Noise Pollution and Vibrations | Affects residents, weak nearby buildings    | Moderate      | Restrict hours, use sound barriers, routine maintenance, vibration monitors  | Daily                   | Noise/vibration log, complaints               | Contractor, PIU            | Project Budget  |
| Demolition    | Removal of materials                               | Solid Waste                    | Improper disposal risks                     | High          | Segregation, licensed                                                        | Weekly                  | Waste disposal log                            | Contractor,                | Project Budget  |

| Project Phase | Activity                          | Potential Impact                 | Risk Characterization            | Impact Rating | Mitigation / Enhancement Measure                         | Timing                   | Monitoring Indicators              | Responsible Party                | Source of Funds |
|---------------|-----------------------------------|----------------------------------|----------------------------------|---------------|----------------------------------------------------------|--------------------------|------------------------------------|----------------------------------|-----------------|
|               |                                   | Generation                       |                                  |               | haulers, secure storage onsite                           |                          |                                    | Municipality                     |                 |
| Demolition    | Asbestos/lead-based paint removal | Hazardous Material Exposure      | Chronic illness, ecological harm | High          | Licensed hazmat disposal, sealed PPE, training           | Start and as encountered | Waste manifest, exposure incidents | Contractor (Licensed), PIU       | Project Budget  |
| Demolition    | Demolition runoff                 | Water Pollution                  | Wastewater entering open drains  | Moderate      | Containment barriers, stormwater drains, dry season work | Continuous               | Water quality reports              | Contractor, Municipal Sanitation | Project Budget  |
| Demolition    | Equipment storage/use             | Soil Degradation & Contamination | Oil/fuel leakages                | Moderate      | Leak-proof storage, spill kits, impermeable platforms    | Weekly                   | Soil testing, incident logs        | Contractor, PIU                  | Project Budget  |

| Project Phase | Activity            | Potential Impact               | Risk Characterization                   | Impact Rating | Mitigation / Enhancement Measure                         | Timing     | Monitoring Indicators          | Responsible Party           | Source of Funds      |
|---------------|---------------------|--------------------------------|-----------------------------------------|---------------|----------------------------------------------------------|------------|--------------------------------|-----------------------------|----------------------|
| Demolition    | General works       | OSH Risks                      | Falling debris, dust, chemical exposure | High          | PPE, first aid, safety induction, daily briefings        | Daily      | Incident reports, safety audit | Contractor, PIU, H&S Expert | Project Budget       |
| Demolition    | Open site           | Security Threats and Intrusion | Theft, terrorism, looting               | High          | 24/7 security, restricted zones, lighting, fencing       | Continuous | Incident logs                  | Contractor, MoF Security    | MoF + Project Budget |
| Demolition    | Site activity       | Community Disturbance          | Disruption to daily life, road access   | Moderate      | Signage, alternative routes, community liaison           | Daily      | Complaints registered          | Contractor, Local Gov       | Project Budget       |
| Demolition    | Machinery, fuel use | GHG Emissions                  | GHG, urban heating                      | Low           | Efficient machinery, monitor fuel usage, explore offsets | Monthly    | Fuel logs, emission estimate   | Contractor, ESMP Consultant | Project Budget       |

| Project Phase | Activity                     | Potential Impact     | Risk Characterization      | Impact Rating | Mitigation / Enhancement Measure                  | Timing            | Monitoring Indicators | Responsible Party            | Source of Funds |
|---------------|------------------------------|----------------------|----------------------------|---------------|---------------------------------------------------|-------------------|-----------------------|------------------------------|-----------------|
| Construction  | Site clearing and grading    | Loss of Vegetation   | Soil erosion, habitat loss | Moderate      | Replanting, landscaping plan, native species      | After civil works | Site vegetation index | Contractor, MoE              | Project Budget  |
| Construction  | Excavation, vehicle movement | Air Pollution        | Dust, emissions            | Moderate      | Dust suppression, emission checks, covered trucks | Daily             | AQI, logs             | Contractor, PIU              | Project Budget  |
| Construction  | Concrete mixing, metal work  | Noise and Vibrations | Nuisance, anxiety, damage  | Moderate      | Schedule work, noise shields, monitor vibrations  | Daily             | Noise logs            | Contractor, PIU              | Project Budget  |
| Construction  | Excavation, fuels            | Water Pollution      | Leaks, contamination       | Moderate      | Containment basins, no storage near drains        | Continuous        | Water quality checks  | Contractor, Local Env. Dept. | Project Budget  |

| Project Phase | Activity             | Potential Impact      | Risk Characterization       | Impact Rating | Mitigation / Enhancement Measure                   | Timing | Monitoring Indicators       | Responsible Party        | Source of Funds |
|---------------|----------------------|-----------------------|-----------------------------|---------------|----------------------------------------------------|--------|-----------------------------|--------------------------|-----------------|
| Construction  | Material demand      | Pressure on Utilities | Load on water, power, roads | Moderate      | Schedule supply deliveries, liaise with utilities  | Weekly | Utility complaints, outages | Contractor, Municipality | Project Budget  |
| Construction  | Heavy equipment      | Soil Compaction       | Drainage disruption         | Moderate      | Use marked paths, loosen soil, erosion control     | Weekly | Site inspection logs        | Contractor               | Project Budget  |
| Construction  | Building activities  | Solid Waste           | Site clutter, pollution     | High          | Waste bins, labeling, segregated collection        | Daily  | Waste tracking log          | Contractor               | Project Budget  |
| Construction  | Washdown, sanitation | Liquid Waste          | Greywater contamination     | Moderate      | Mobile toilets, oil-water separators, dry washdown | Weekly | Wastewater tests            | Contractor               | Project Budget  |

| Project Phase | Activity                | Potential Impact          | Risk Characterization     | Impact Rating | Mitigation / Enhancement Measure                | Timing           | Monitoring Indicators   | Responsible Party        | Source of Funds |
|---------------|-------------------------|---------------------------|---------------------------|---------------|-------------------------------------------------|------------------|-------------------------|--------------------------|-----------------|
| Construction  | labour influx           | Socio-cultural disruption | Tensions, resource strain | Moderate      | Code of conduct, community engagement           | Pre-deployment   | Conflict incidents      | Contractor, PIU          | Project Budget  |
| Construction  | General site work       | OSH Hazards               | Accidents, exposure       | High          | Safety plan, training, signage, PPE             | Daily            | Incident reports        | Contractor, H&S Officer  | Project Budget  |
| Construction  | Vehicle movement, noise | Community Health & Safety | Accidents, access limits  | High          | Traffic signs, flagmen, safe crossings          | Daily            | Traffic and safety logs | Contractor               | Project Budget  |
| Construction  | Unsecured site          | Security Risks            | Theft, sabotage           | High          | Secure perimeter, ID cards, local law support   | Continuous       | Breach reports          | Contractor, MoF Security | Project Budget  |
| Construction  | Fossil fuel use, cement | Climate Impact            | GHG emissions             | Moderate      | Fuel-efficient machines, local materials, trees | Design + Ongoing | Emissions audit         | PIU, Engineer            | Project Budget  |

| Project Phase | Activity                | Potential Impact   | Risk Characterization    | Impact Rating | Mitigation / Enhancement Measure                 | Timing              | Monitoring Indicators | Responsible Party | Source of Funds    |
|---------------|-------------------------|--------------------|--------------------------|---------------|--------------------------------------------------|---------------------|-----------------------|-------------------|--------------------|
| Construction  | labour influx           | GBV                | Harassment, exploitation | High          | GBV Action Plan, code of conduct, hotlines       | Pre-works + Ongoing | GBV incident log      | PIU, Contractor   | Project Budget     |
| Construction  | Child labour risks      | Child labour       | Underage on-site work    | High          | ID checks, labour policy enforcement             | Pre-construction    | Site audits           | Contractor        | Project Budget     |
| Construction  | Interaction with locals | HIV/STI Risk       | Health spread risk       | Moderate      | Awareness training, condom distribution, clinics | Monthly             | Health outreach stats | PIU, MoH Partner  | Project Budget     |
| Crosscutting  | Staff prep              | ISS & GBV Training | Knowledge gap            | Moderate      | AfDB E&S and GBV training for all leads          | Prior to works      | Attendance records    | PIU               | AfDB Capacity Fund |

| Project Phase | Activity            | Potential Impact    | Risk Characterization     | Impact Rating | Mitigation / Enhancement Measure                      | Timing             | Monitoring Indicators | Responsible Party | Source of Funds |
|---------------|---------------------|---------------------|---------------------------|---------------|-------------------------------------------------------|--------------------|-----------------------|-------------------|-----------------|
| Crosscutting  | Community awareness | Emergency, GRM, GBV | Unpreparedness, exclusion | High          | Trainings for leaders, hotline display, sensitization | Start-up + Ongoing | Engagement logs       | PIU               | Project Budget  |



Table 20: Estimated ESMP implementation cost

| Category   | Activity                                                      | Unit     | Quantity | Unit Cost (USD) | Total Cost (USD) | Source of Fund              |
|------------|---------------------------------------------------------------|----------|----------|-----------------|------------------|-----------------------------|
| Mitigation | Dust suppression (water spraying)                             | Month    | 12       | 1,500           | 18,000           | Contractors approved budget |
|            | Noise reduction (acoustic barriers, equipment mufflers)       | Lump Sum | 1        | 20,000          | 20,000           | Contractors approved budget |
|            | Proper debris handling & hazardous waste disposal             | Lump Sum | 1        | 25,000          | 25,000           | Contractors approved budget |
|            | Soil erosion/sediment control                                 | Lump Sum | 1        | 10,000          | 10,000           | Contractors approved budget |
|            | Air quality protection and (covering trucks, dust nets, etc.) | Lump Sum | 1        | 8,000           | 8,000            | Contractors approved budget |
|            | Temporary sanitation facilities for workers                   | Month    | 12       | 1,200           | 14,400           | Contractors approved budget |

| Category          | Activity                                                 | Unit      | Quantity | Unit Cost (USD) | Total Cost (USD) | Source of Fund                      |
|-------------------|----------------------------------------------------------|-----------|----------|-----------------|------------------|-------------------------------------|
| Monitoring        | Environmental monitoring (air, water, noise, soil)       | Quarter   | 4        | 5,000           | 20,000           | MoF                                 |
|                   | Social monitoring (grievance redress, labour conditions) | Quarter   | 4        | 3,000           | 12,000           | MoF                                 |
|                   | Third-party environmental audit                          | Per Audit | 2        | 7,500           | 15,000           | MoF                                 |
| Capacity Building | ESMP training for contractor & site staff                | Session   | 4        | 2,500           | 10,000           | Contractors approved budget         |
|                   | Community awareness sessions                             | Session   | 4        | 1,500           | 6,000            | Contractors approved budget and MoF |
|                   | Development of site-specific CEMP documentation          | Lump Sum  | 1        | 5,000           | 5,000            | Contractors approved budget         |

| Category        | Activity                                  | Unit     | Quantity | Unit Cost (USD) | Total Cost (USD) | Source of Fund              |
|-----------------|-------------------------------------------|----------|----------|-----------------|------------------|-----------------------------|
|                 | PPE and safety gear for workers           | Lump Sum | 1        | 10,000          | 10,000           | Contractors approved budget |
| Contingency     | Miscellaneous unforeseen ESMP costs (10%) | -        | -        | -               | 17,340           |                             |
| <b>SUBTOTAL</b> |                                           |          |          |                 | <b>190,740</b>   |                             |
| Contingency     | Miscellaneous unforeseen ESMP costs (10%) | -        | -        | -               | 17,340           |                             |
| <b>TOTAL</b>    |                                           |          |          |                 | <b>208,080</b>   |                             |

## **CHAPTER 11: CONCLUSIONS AND RECOMMENDATIONS**

### **11.1. Conclusion**

The Environmental and Social Impact Assessment (ESIA) for the proposed demolition and reconstruction of the Ministry of Finance (MoF) Headquarters in Mogadishu has thoroughly examined the potential environmental and social risks associated with the project. The assessment considered both the demolition and construction phases, as well as the long-term operational phase of the new facility.

Key impacts identified include dust and noise emissions, solid and hazardous waste generation, occupational and community health and safety risks, pressure on utilities and infrastructure, risks of gender-based violence (GBV), and potential disruption to nearby communities. These impacts have been categorized as low to moderate in significance and are deemed to be manageable through well-defined mitigation measures presented in the Environmental and Social Management Plan (ESMP).

The ESMP outlines comprehensive mitigation and enhancement measures, implementation responsibilities, monitoring indicators, and an estimated budget to guide environmental and social performance throughout the project lifecycle. Furthermore, the project aligns with the legal and institutional frameworks of the Federal Republic of Somalia and complies with the African Development Bank's Integrated Safeguards System (ISS), as well as international best practices for environmental and social sustainability.

In view of the findings of this ESIA and the adequacy of the proposed mitigation measures, it is concluded that the project is environmentally sound, socially acceptable, and economically viable.

There are no anticipated adverse impacts that cannot be mitigated or managed to acceptable levels. Therefore, this report recommends that the project be granted environmental and social approval and be allowed to proceed to implementation.

## **11.2. Recommendations**

All proposed mitigation and monitoring measures under the ESMP must be fully integrated into project planning, procurement, and execution. Contractors should be contractually obligated to comply with specific environmental, health, and safety clauses.

### **1. Occupational Health & Safety (OHS):**

Workers must be provided with Personal Protective Equipment (PPE), trained on site safety protocols and supported by a qualified Health and Safety Officer. Regular safety audits should be conducted.

### **2. Community Health and Safety:**

The project should implement clear signage, traffic management plans, safe pedestrian access routes, and public awareness campaigns to minimize disturbance to surrounding communities.

### **3. Security Management:**

Given the project's location and strategic importance, a robust site-specific Security Management Plan should be developed and implemented. This should include 24/7 security personnel, perimeter fencing, controlled site access, coordination with state security agencies and emergency response protocols.

### **4. GBV, SEA/SH, and Child Protection Measures:**

Contractors must enforce Codes of Conduct and participate in GBV/SEA/SH training. Awareness campaigns, confidential reporting channels, and referral pathways must be provided to support survivors of any form of abuse or exploitation.

### **5. HIV/AIDS and STI Prevention:**

Workers and surrounding communities should benefit from targeted awareness campaigns and access to voluntary counseling and testing services, in partnership with the Ministry of Health or local CSOs.

#### **6. Labour and Social Safeguards:**

The project should adhere to grievance redress mechanisms (GRMs), prevent child labour and promote gender equity in hiring and treatment of workers.

#### **7. Hazardous Waste and Asbestos Handling:**

All hazardous materials, including asbestos, should be handled by licensed professionals with proper containment, PPE, disposal procedures, and regulatory oversight.

#### **8. Capacity Building and Training:**

The PIU, contractors and supervising consultants must undergo periodic capacity-building sessions on ESMP implementation, emergency preparedness and AfDB safeguard compliance.

#### **9. Stakeholder Engagement and Grievance Redress:**

A Stakeholder Engagement Plan (SEP) should guide continuous dialogue with the affected community. The GRM must be functional, accessible, and responsive throughout all phases.

#### **10. Environmental Enhancement Measures:**

Upon project completion, landscaping, tree planting and establishment of green spaces around the new MoF compound should be prioritized to promote environmental quality and urban aesthetics.

### **11. Monitoring and Reporting:**

The PIU must ensure regular internal and external environmental and social performance audits, maintain compliance documentation and submit monthly and quarterly reports to relevant national authorities and AfDB.

### **12. Sustainability and Green Building Practices:**

Where feasible, the project should integrate energy-efficient technologies, solar lighting and water-saving fixtures in building design and operation to promote long-term sustainability.

## CHAPTER 12: REFERENCES

1. African Development Bank. (2001). *Environmental and social assessment procedures (ESAP)*. <https://www.afdb.org/en/documents/environmental-and-social-assessment-procedures>
2. African Development Bank. (2013). *Integrated safeguards system: Policy statement and operational safeguards*. <https://www.afdb.org/en/documents/document/afdb-integrated-safeguards-system-policy-statement-and-operational-safeguards-34928>
3. Federal Government of Somalia. (1972). *Labour Code, Law No. 65*. Mogadishu
4. Federal Government of Somalia. (2012). *Provisional Constitution of the Federal Republic of Somalia*. Mogadishu.
5. Inter-Agency Standing Committee. (2015). *Guidelines for integrating gender-based violence interventions in humanitarian action*. <https://interagencystandingcommittee.org/guidelines-for-integrating-gbv>
6. Ministry of Environment and Climate Change. (n.d.). *National environmental policy*. Federal Government of Somalia.
7. Ministry of Labour and Social Affairs. (2021). *Occupational safety and health policy (Draft)*. Federal Government of Somalia.
8. Ministry of Planning, Investment and Economic Development. (2020). *Somalia's National Transformation Plan (NTP), 2025–2029*. Federal Government of Somalia.
9. Somalia Water and Land Information Management. (2023). *Climate data and analysis for Somalia*. Food and Agriculture Organization of the United Nations. <https://www.faoswalim.org>
10. United Nations Environment Programme. (2002). *Environmental impact assessment training resource manual (2nd ed.)*. <https://www.unep.org/resources/training-resource-manual-environmental-impact-assessment>
11. United Nations Environment Programme. (2016). *Open burning: A global health disaster*. <https://www.ccacoalition.org/en/resources/open-burning-global-health-disaster>
12. UN-Habitat. (2022). *Mogadishu urban profile report*. <https://unhabitat.org>



13. United States Environmental Protection Agency. (1974). *Information on levels of environmental noise requisite to protect public health and welfare with an adequate margin of safety*. U.S. Government Printing Office.
14. World Bank Group. (2007). *Environmental, health, and safety guidelines: General EHS guidelines*. International Finance Corporation.  
[https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/ehs-guidelines](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines)
15. World Health Organization. (2021). *WHO global air quality guidelines: Particulate matter, ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide*.  
<https://www.who.int/publications/i/item/9789240034228>
16. IQAir. (2024). *Mogadishu Air Quality Index (AQI) and PM<sub>2.5</sub> air pollution*.  
<https://www.iqair.com/somalia/Banaadir/mogadishu>
17. OpenAQ. (2024). *Open air quality data for Somalia*. <https://openaq.org>
18. Plume Labs, & WeatherBug. (2025). *Live air pollution monitoring for East Africa*.  
<https://www.weatherbug.com/air-quality>

## APPENDICES

### Appendix 1: Contractor's C-ESMP Contents

|                                                                                       |                                                                            |
|---------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| a) Project Background Information                                                     | q) Noise and Vibration Management Plan                                     |
| b) General Information                                                                | r) Hazardous Prevention and Control Plan                                   |
| c) Contractors Environment, Social, Health and safety Policies                        | s) Solid and liquid Waste Management Plan                                  |
| d) Licenses and permits to be acquired                                                | t) Health and Safety Management Plan                                       |
| e) Personal Protective Equipment/welfare requirements                                 | u) Gender Based Violence, Sexual Exploitation Prevention and Response Plan |
| f) Scope of ESMP and HSMP                                                             | v) Program Induced labour Influx                                           |
| g) Objectives of the ESMP and HSMP                                                    | w) Workers Accommodation Plan                                              |
| h) Project Description and Baseline Information                                       | x) HIV/AIDS and Drug Abuse Prevention                                      |
| i) Site and Work Activities                                                           | y) Security Plans                                                          |
| j) Analysis of Legal Provisions                                                       | z) Employees and Employers Code of Conduct                                 |
| k) Resource Roles and Responsibilities of Workforce on site                           | a) Logistic Risks Management Plan                                          |
| l) Competence and awareness training                                                  | b) Grievance Redress Mechanism                                             |
| m) Standard Operating Procedures                                                      | c) Traffic Management Plan                                                 |
| n) Stakeholder engagement and Grievance Management                                    | d) Emergency Preparedness and Response Plan                                |
| o) Environment, Social Health and Safety Management Plan for Specific site activities | e) Material Borrow pits/Quarry Management Plan                             |
| p) Environment Social Health and Safety Monitoring Plan                               | f) Biodiversity Management Plan Erosion and Sediment Control Plan          |



## Appendix 2: Grievance Resolution Forms, and Database (Log) Template

### GRIEVANCE RESOLUTION FORMS

|                     |  |
|---------------------|--|
| NAME OF COMPLAINANT |  |
| PAP ID NUMBER       |  |
| TELEPHONE NUMBER    |  |
| DISTRICT            |  |
| DATE                |  |

### NATURE OF GRIEVANCE OR COMPLAINT

|                                        |
|----------------------------------------|
|                                        |
|                                        |
|                                        |
|                                        |
|                                        |
| <b>SUMMARY OF FOLLOW-UP DISCUSSION</b> |
| NAME OF PERSON CONTACTED:<br>TITLE:    |
|                                        |



## **SUMMARY OF CONCILIATION SESSION DISCUSSION**

|       |
|-------|
| DATE: |
|       |
|       |
|       |
|       |
|       |

Was agreement reached on the issues?

|         |
|---------|
| 1) YES: |
| 2) NO:  |

|                                                            |
|------------------------------------------------------------|
| <b>PROVIDE DETAILS OF AGREEMENT/POINTS OF DISAGREEMENT</b> |
|                                                            |
|                                                            |
|                                                            |
|                                                            |
|                                                            |

Date of Conciliation/ Review Session:

\_\_\_\_\_

Was Filer Present? (Please tick one) Yes ..... No.....

Was field verification of complaint conducted? Yes ..... No.....

Findings of field investigation:

.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....

Complainant/Filer

Name

.....  
.....  
.....  
.....

If not complainant, position/ relationship to

filer.....

Signature.....

Date: .....

Conciliator Name and

Signature.....

Date: .....

Independent Observer Name and

Signature.....

Date: .....



## Grievance Database (Log) Template

|                                                 |  |
|-------------------------------------------------|--|
| <b>Grievance Log Sheet</b>                      |  |
| <b>GM Reference No</b>                          |  |
| <b>Date Received</b>                            |  |
| <b>Received By</b>                              |  |
| <b>Name of Complainant/Anonymous</b>            |  |
| <b>Sex (Male/Female)</b>                        |  |
| <b>Vulnerable (Yes/No)</b>                      |  |
| <b>Location</b>                                 |  |
| <b>Brief Description of Concern</b>             |  |
| <b>Category</b>                                 |  |
| <b>Date Acknowledged</b>                        |  |
| <b>Responsible Institution /Department</b>      |  |
| <b>Proposed Resolution /Feedback to Comment</b> |  |
| <b>Date of Resolution</b>                       |  |
| <b>Date Closed</b>                              |  |

|                                                |  |
|------------------------------------------------|--|
| <b>Satisfied with the Process<br/>(Yes/No)</b> |  |
| <b>If no, why not?</b>                         |  |
| <b>Satisfied with the outcome<br/>(Yes/No)</b> |  |
| <b>If not, why not</b>                         |  |

### **Appendix 3: Environmental and Social Rules for Contractors**

These Environmental and Social Rules for Contractors are prepared for all the contractors to be engaged in for the demolition of the existing MoF building, and the construction of the new building. The contractor is required to follow the ESMP of the project which include provisions for proper management of the demolition/construction site, the safe storage of construction materials and safe disposal of waste. These conditions must be part of the tender documents' requirement.

#### **General Considerations:**

- The contractor shall, in all activities ensure maximum protection of the environment and the socioeconomic well-being of the people affected by the project, whether within or outside the physical boundaries of the project area.
- Before any construction work begins, the contractor shall ensure that the relevant environmental and any other relevant certificates of authorization for the works have been obtained from the responsible government departments.
- In general, the contractor shall familiarize with the Environmental and Social Management Plan. Specifically, the contractor shall make every effort to follow and implement the recommendations and mitigation measures of the ESMP to the satisfaction of the client and all relevant agencies.
- The contractor shall work in cooperation and in coordination with the Project Management Team and/or any other authority appointed to perform or to ensure that the social and environmental work is performed according to the provisions of the Environmental and Social Screening and Environmental Management plans for the project/sub-projects.
- The contractor shall always keep on site and make available to Environmental Inspectors or any authorized persons, copies of the ESMP for the monitoring and

evaluation of environmental and social impacts and the level or progress of their mitigation activities.

### **Acquisition of Construction Materials:**

➤ The contractor should ensure that construction materials such as sand, quarry stone, soil or any other construction materials are acquired from approved suppliers and that the production of these materials by the suppliers, or the contractor does not violate the environmental regulations or procedures.

### **Movement and Transportation of Demolition/Construction Materials:**

➤ The movement and transportation of demolition/construction materials to and within the site shall be done in a manner that generates minimum impacts on the environment and on the community, as required by the ESMP.

### **Storage of Construction Materials:**

- Construction materials shall be stored in a manner to ensure that:
- There is no obstruction of service roads, passages, driveways and footpaths.
- Where it is unavoidable to obstruct any of the service paths, the contractor should provide temporary or alternate bypasses without inconveniencing the flow of traffic or pedestrians.
- There is no obstruction of drainage channels and natural water courses.
- There is no contamination of surface water, ground water or the soil.
- There is no access by public or unauthorized people to materials and equipment storage areas.
- There is no access for staff without protective clothing to materials and equipment storage areas.

➤ Access by public or unauthorized persons to hazardous, corrosive or poisonous substances including lagging, sludge, chemicals, solvents, oils or their receptacles such as boxes, drums, sacks and bags is prohibited.

➤ Access by staff, without the appropriate protective clothing, to hazardous, corrosive or poisonous substances including asbestos lagging, sludge, chemicals, solvents, oils or their receptacles such as boxes, drums, sacks and bags are prohibited.

### **Community Interaction:**

➤ Workers will be subjected to the laws of the land should they be found in gender violence, inappropriate relationships with minors, rape and impregnation without consent.

➤ Interaction with the community will be overseen by the community leadership who will hold the mandate to report to Government authorities any contractor workers proved to breach peace of the community. The law shall also take its course in such incidences.

➤ The contractor and workers will settle all bills incurred within the community before their final payment is made by the client.

➤ The contractor will enable free and open access to the Grievance Redress Mechanism as needed by the communities

➤ The contractor has the responsibility to relay these rules to workers.

### **Commitment to Abiding by the Rules:**

➤ All contractors will distribute and explain the above rules and all workers regardless of rank, position, origin, skills, race and qualifications will be required to sign the commitment.

## **Appendix 4: Gender based Violence Prevention Plan**

Gender Based Violence is any conduct, comment, gesture, or contact perpetrated by an individual based on gender on the work site or in its surroundings, or in any place that results in, or is likely to result in, physical, sexual, or psychological harm or suffering to another individual without his/her consent, including threats of such acts, coercion, or arbitrary deprivations of liberty.

The populations at high risk of GBV are women and girls because gender-based violence is largely rooted in societal norms that perpetuate power differentials between men and women. Some of the form of gender-based violence that could arise from the project includes rape and sexual assault; sexual harassment; unwanted sexual advances including touching physical violence/ assault; use of abusive, sexually provocative, demeaning or culturally inappropriate language; domestic violence; sexual interactions that are not agreed to with full consent by all parties.

Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior; discrimination against women and children.

### **Generic mitigation measure:**

To mitigate the risks of the GBV risks associated with the project, the following general mitigation measures will have to be applied before and during the implementation of subprojects:

- Sensitize communities on GBV risks of the project during stakeholders' engagement prior to implementation of project activities.
- Develop and institute an effective grievance redress mechanism and sensitize the community on the same before implementation of subprojects.
- Ensure that the code of conduct is signed and understood by all contractor staff.
- The contractor should include a GBV response proposal in the contractor ESMP and should be evaluated prior to project implementation.

- Provide separate rest room facilities for men and women; and provide appropriate signage on GBV in local language.
- Some serious risks of GBV such as rape, sexual assault and physical violence should be reported to the Police as early as possible as they are criminal in nature.



## **Appendix 5: Emergency Preparedness Plan (EPP)**

### **Contractor's Emergency Preparedness and Response Plan (EPRP) – Required Contents**

The contractor shall develop and maintain a comprehensive Emergency Preparedness and Response Plan (EPRP) that addresses all potential environmental, occupational health, and security-related emergencies during the project lifecycle. The EPRP shall be submitted to the supervising engineer and relevant authorities prior to commencement of works.

The plan must include the following:

#### **1. Emergency Scenarios and Risk Assessment**

Identification of all potential emergency events (e.g., fire, explosion, chemical spill, collapse, flood, extreme weather, security breach, etc. Site-specific risk assessment for each scenario, including likelihood and severity.

#### **2. Preventive Measures**

Description of proactive steps to minimize the risk of emergencies (e.g., proper storage of flammables, controlled access zones, safe work procedures, weather monitoring).

#### **3. Emergency Response Procedures**

- Step-by-step procedures for each type of emergency.
- Evacuation routes, assembly points, and rescue strategies.
- Chain of command during emergencies.

#### **4. Security Protocols**

- Site security plan including guarding, access control, surveillance, and coordination with local law enforcement.
- Response strategy for armed conflict, theft, sabotage, or violent protests.
- Emergency lockdown or shelter-in-place procedures.

## 5. Emergency Equipment and Infrastructure

- Inventory and locations of fire extinguishers, first aid kits, spill kits, emergency lighting, and communication devices.
- Access to emergency response equipment (e.g., ambulances, firefighting units).
- Clearly marked muster points and emergency signage.

## 6. Roles and Responsibilities

- Designation of an Emergency Response Coordinator.
- List of trained first responders, fire wardens, and safety officers.
- Defined responsibilities for all personnel during emergencies.

## 7. Training and Drills

- Schedule for regular emergency preparedness drills (fire, evacuation, chemical spill, security breach).
- Induction and refresher training for all workers on EPRP procedures.
- Evaluation and documentation of drill effectiveness.

## 8. Communication and Notification Protocol

- Internal notification process for activating emergency procedures.
- External communication with police, fire brigade, hospitals, local administration, and affected community.
- Use of loudspeakers, alarms, mobile alerts, and radios.

## 9. Coordination with External Agencies

- Contacts and protocols for coordination with local disaster response teams, hospitals, security agencies, and municipal authorities.
- Memoranda of understanding (MoUs) if needed.

## 10. Post-Incident Recovery

- Procedures for clean-up, repair, and restoration after incidents.
- Investigation and root cause analysis.
- Corrective and preventive actions (CAPA) to prevent recurrence.

#### 11. Documentation and Reporting

- Emergency Incident Register to log all emergencies and near misses.
- Reporting formats and timelines to client, regulators, and financiers (AfDB).
- Recordkeeping of training, drills, and incidents.

#### 12. Information Disclosure

- Awareness materials and briefings for workers and nearby communities.
- Posters, signs, and maps displayed on site.
- Updates on plan changes communicated to all stakeholders.

## Appendix 6: Codes of Conduct

### 1. CONTRACTOR'S CODE OF CONDUCT

This Code of Conduct outlines the social and ethical responsibilities of the contractor under the MoF Headquarters Demolition and Reconstruction Project. It aims to address risks related to Gender-Based Violence (GBV), Violence Against Children (VAC), and other forms of misconduct and ensures a safe and respectful work environment for all.

- Core Principles and Minimum Standards of Behavior:
  - a) Acts of GBV or VAC (including grooming and exploitation) constitute gross misconduct. Violations shall result in sanctions, penalties, termination of employment, and legal action.
  - b) Treat all persons with respect, especially women, children (under 18), and persons with disabilities—regardless of ethnicity, religion, gender, or background.
  - c) Do not use inappropriate, harassing, abusive, sexually provocative, or culturally insensitive language or behavior.
  - d) Sexual activity or communication with children (under 18), including through digital platforms, is strictly prohibited. Mistaken belief of age or consent is not a defense.
  - e) Exchange of money, goods, services, or employment for sexual favors is forbidden.
  - f) Sexual relationships with community members involving promises or actual provision of benefits are considered exploitative and non-consensual under this code.
  - g) Suspicions or observations of GBV/VAC must be reported through the established Grievance Redress Mechanism (GRM). Whistleblowers and survivors will be protected.
  - h) All contractor staff must attend project induction and ongoing monthly training on GBV, VAC, HIV/AIDS, occupational safety, and social risk mitigation.
  - i) The contractor must allocate budget and ensure compliance with OHS requirements.
  - j) Dress codes must avoid being offensive, sexually provocative, politically sensitive, or discriminatory. All staff must wear appropriate PPE.
  - k) Contractors must provide HIV/AIDS awareness and prevention training to all employees.

- l) Compliance with Somali labour laws, international labour standards, and AfDB safeguard policies is mandatory.
  - m) Ensure that all employees sign individual Codes of Conduct prior to commencing work.
  - n) Ensure equitable access to natural resources (e.g., water) to prevent community conflict.
  - o) Protect worker rights including fair wages, working hours, and leave policies.
  - p) Employ local workers (especially unskilled labour) to the extent possible.
  - q) Install and maintain visible signposts around the construction area to promote safety and awareness.
- Contractor Acknowledgment:

I acknowledge that I have read and understand this Code of Conduct and commit to enforcing its standards throughout the MoF project lifecycle.

FOR THE CONTRACTOR: Signed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## 2. INDIVIDUAL WORKER'S CODE OF CONDUCT

This Code of Conduct is applicable to all individuals engaged in the MoF Headquarters Demolition and Reconstruction Project. The aim is to promote professional conduct, prevent GBV and VAC, and ensure a safe, respectful, and lawful worksite.

- Individual Commitments:
  - a) I, \_\_\_\_\_, agree to:
  - b) Consent to a security background check as a condition of employment.
  - c) Treat women, children, and persons with disabilities respectfully, regardless of any differences in race, culture, religion, or status.
  - d) Never engage in or facilitate sexual activity with anyone under 18 years of age, including grooming and digital engagement.
  - e) Never exchange goods, money, employment, or services for sex.
  - f) Avoid any sexual interactions with coworkers or community members that are not entirely consensual and free of coercion.
  - g) Attend regular training sessions on HIV/AIDS prevention, GBV, VAC, safety, and rights awareness.
  - h) Report any suspicions or incidents of misconduct, GBV, or VAC to the GRM, and do so in good faith.
  - i) Never invite unaccompanied minors to personal residences or engage in unsupervised situations with children.
  - j) Avoid physical punishment or inappropriate hiring of minors.
  - k) Comply with national laws concerning child labour and child protection.
  - l) Abstain from theft or damage of company or community property.
  - m) Stay within designated work zones during working hours.
  - n) Refrain from possessing or using alcohol, drugs, or controlled substances during work.
  - o) Always wear required PPE and comply with safety standards.
  - p) Adhere to environmental, occupational health, and safety procedures.
  - q) Use the grievance redress mechanisms responsibly and without retaliation.
  - r) I understand that any behavior inconsistent with this Code may result in disciplinary action, including termination and legal action.

Worker Acknowledgment:

Signed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

FOR THE EMPLOYER: Signed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## **Appendix 7: Contractor Environmental and Social Policy Commitment**

### **CONTRACTOR ENVIRONMENTAL AND SOCIAL POLICY COMMITMENT**

**PROJECT: Ministry of Finance (MoF) Headquarters Demolition and Reconstruction Project – Mogadishu, Somalia**

**CONTRACTOR.....**

At [Insert Company Name], we are fully committed to upholding and promoting high standards of environmental and social performance throughout the implementation of the MoF Demolition and Reconstruction Project. We recognize the potential environmental and social impacts of construction activities and are therefore dedicated to minimizing harm while enhancing positive outcomes for people and the environment.

We adopt the following Environmental and Social Policy Commitment:

#### **1. Regulatory Compliance**

- We commit to strict compliance with all applicable environmental, occupational health and safety, and social protection laws and regulations of the Federal Government of Somalia, as well as international standards including the African Development Bank (AfDB) Integrated Safeguards System (ISS) and other relevant international frameworks.
- We will obtain, maintain, and adhere to all environmental licenses, permits, and approvals necessary for our operations on the MoF Project.

#### **2. Sustainable Resource Management**

- We will ensure the responsible and efficient use of natural resources, including water, raw materials, fuel, and energy, throughout the project lifecycle.
- Our practices will support environmental sustainability, including the use of renewable energy where feasible and the integration of energy-efficient technologies and systems.



### **3. Pollution Prevention and Control**

- We will minimize emissions, effluents, noise, vibrations, and dust generated from demolition and construction activities by implementing best practices and effective control measures.
- We are committed to the adoption of cleaner production techniques and waste reduction measures to prevent environmental degradation.
- Hazardous materials will be safely handled, stored, and disposed of following environmental best practices and national hazardous waste management guidelines.

### **4. Environmental Mitigation and Monitoring**

- We will implement environmental and social mitigation measures, as detailed in the Environmental and Social Management Plan (ESMP), and establish clear monitoring and reporting frameworks.
- Regular environmental audits and reviews will be conducted to evaluate compliance and performance, and corrective measures will be implemented as needed.

### **5. Health, Safety, and Risk Management**

- We commit to protecting the health and safety of our workforce, project-affected communities, and all stakeholders by promoting a zero-harm culture.
- Comprehensive safety training will be provided, and emergency preparedness and response mechanisms will be in place.
- All workers will be provided with and required to wear Personal Protective Equipment (PPE) appropriate to their roles.

## **6. Social Responsibility and Stakeholder Engagement**

- We recognize the rights and dignity of local communities and commit to meaningful stakeholder engagement, grievance redress, and transparent communication.
- Community health and safety will be prioritized, and construction schedules and noise will be managed to minimize disturbance to nearby residents.
- We will establish and maintain an effective Grievance Redress Mechanism (GRM) for timely resolution of any community complaints or concerns.

## **7. Gender, Child Protection, and Non-Discrimination**

- We uphold zero tolerance for all forms of Gender-Based Violence (GBV), Violence Against Children (VAC), and workplace harassment or discrimination.
- All employees will be sensitized on the Contractor's and Individual Code of Conduct, and any violation will be treated as gross misconduct.
- Opportunities will be created for inclusive employment, especially for women and marginalized groups, in compliance with national labour laws.

## **8. Capacity Building and Awareness**

- All staff will be trained on environmental and social safeguards, health and safety practices, GBV/VAC prevention, and emergency response.
- Our teams will be encouraged and empowered to act as environmental stewards, demonstrating leadership in sustainability and safety.

## **9. Environmental Aesthetics and Site Management**

- We are committed to maintaining a clean, organized, and aesthetically acceptable construction site and camp area.

- Landscaping and restoration works will be undertaken post-construction, including tree planting, lawn establishment, and solid waste clearance.

#### **10. Continuous Improvement and Accountability**

- We will allocate adequate financial and human resources to implement and monitor this Environmental and Social Policy.
- Annual environmental and social performance self-evaluations will be undertaken, and results shared with relevant stakeholders.
- We are committed to establishing independent external environmental audits to evaluate compliance and improve long-term sustainability.

By signing this policy, we affirm our unwavering commitment to responsible environmental and social stewardship in the successful delivery of the MoF Headquarters Project.

**MANAGING DIRECTOR:** \_\_\_\_\_

**SIGNATURE:** \_\_\_\_\_

**DATE:** \_\_\_\_\_

**COMPANY STAMP:** \_\_\_\_\_

## Appendix 8: Minutes of Stakeholders Consultation

### STAKEHOLDER MEETING 1:

#### MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS HELD ON 11<sup>TH</sup> MAY 2025

Jamhuuriyadda Federaalka Soomaaliya  
Wasaaradda Maaliyadda  
Xafiiska isku-duwan Mashruuca  
PCU



جمهورية الصومال الفيدرالية  
وزارة المالية

Federal Republic of  
Somalia  
Ministry of Finance  
Office of the PCU  
Coordinator

#### MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS

|                                                    |                       |
|----------------------------------------------------|-----------------------|
|                                                    |                       |
| <b>Date of meeting:</b> 11 <sup>th</sup> May. 2025 | <b>Time:</b> 11.30 am |
| <b>Venue:</b> Ministry of Finance offices          |                       |
| <b>Ref.:</b>                                       |                       |
|                                                    |                       |

| Agenda of the Meeting                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Welcome, Introduction, and Opening Remarks</li> <li>• Purpose of the Stakeholder Engagement</li> <li>• Discussion on the Current Condition of the MoF Building</li> <li>• Overview of the Planned Demolition and Reconstruction Project</li> <li>• Stakeholder Concerns and Expectations</li> </ul> |

**MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION  
AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS HELD ON 11<sup>TH</sup>  
MAY 2025**

- Anticipated Environmental and Social Impacts
- Mitigation Measures
- Ministry's Commitment to Addressing Stakeholder Concerns
- Open Discussion
- Next Steps and Way Forward
- Closing and Adjournment

**Note: The list of the attendees is attached.**

|   | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>Introduction</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|   | <p>The meeting commenced at 9:30 AM with welcoming remarks by the Director General of the Ministry of Finance. He appreciated the presence of both internal staff and external stakeholders, including representatives from the local community, municipal authorities, security agencies, environmental agencies, development partners, and civil society organizations. Emphasis was placed on the significance of collaborative planning in ensuring that the demolition and construction of the Ministry's new headquarters is inclusive, environmentally responsible, and responsive to the needs of both users and the wider public. The Director noted that this transformational project is not just about infrastructure but about enhancing service delivery, public sector safety, and institutional efficiency.</p> |

**MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS HELD ON 11<sup>TH</sup> MAY 2025**

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>2</b> | <b>Purpose of Engagement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|          | Dr. Suleiman underscored that the purpose of the engagement was to gather stakeholder input and feedback on the planned demolition and reconstruction of the Ministry's aging headquarters. He emphasized that stakeholder views would shape project design, environmental and social safeguards and ensure continuity of service during the transition phase. The consultants echoed this sentiment, highlighting that the ESIA process demands participatory engagement to identify potential risks and co-create viable solutions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>3</b> | <b>Current Condition of the MoF Building</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|          | The Ministry of Finance headquarters is in a severe state of disrepair, with visible structural deterioration, including cracks in walls and ceilings, as well as water damage from leaks that have gone unaddressed for years. The building suffers from outdated and malfunctioning ventilation and lighting systems, creating an uncomfortable and poorly lit work environment. Offices are overcrowded, with cramped and disorganized layouts that hinder productivity and workflow. Electrical wiring is unsafe, posing fire hazards, while critical safety infrastructure like fire exits and suppression systems are either inadequate or nonfunctional. The building also fails to meet basic accessibility standards, lacking ramps, elevators and facilities for persons with disabilities. Staff members report unsafe and unhealthy working conditions, with some departments forced to relocate to satellite offices due to space constraints and safety concerns. The overall state of the building no longer reflects the professionalism of a modern public institution, instead projecting an image of neglect and inefficiency. |

**MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS HELD ON 11<sup>TH</sup> MAY 2025**

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4</b> | <b>Development Plans and past Interventions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|          | <p>The Ministry acknowledged that temporary fixes such as roof patching, electrical rewiring, and plumbing adjustments had been tried over the years. However, these have only delayed an inevitable overhaul.</p> <p>Following a technical assessment, the Ministry resolved to demolish the current structure and build a modern, energy efficient, secure, and inclusive building to house all core departments, improve staff well-being, and restore public confidence.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>5</b> | <b>Impacts of the Current Building Condition</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|          | <p>The Ministry of Finance headquarters remains standing but has been deemed structurally unsafe for occupancy, forcing a full evacuation as a precautionary measure. Visible cracks in load-bearing walls, sagging ceilings, and exposed electrical wiring present immediate hazards to personnel. The building's compromised integrity has suspended normal operations, disrupting administrative functions and workflow continuity. While still physically intact, the facility's advanced deterioration has created an environment where basic occupational safety standards can no longer be met. This preemptive evacuation highlights how structural deficiencies—even before complete failure can cripple essential government operations when a building becomes unfit for its intended purpose. The situation underscores the critical relationship between sound infrastructure and institutional functionality.</p> |
| <b>6</b> | <b>Open discussion on Environmental and Social Impacts and Mitigation Strategies</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|          | <p>During the open dialogue session, participants expressed a range of environmental and social concerns anticipated during the demolition and construction phases of the Ministry of Finance building project. A primary concern was the potential for significant noise and vibration from demolition equipment, which could affect the comfort and well-being of people living or</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

**MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION  
AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS HELD ON 11<sup>TH</sup>  
MAY 2025**

working nearby. In addition, participants highlighted the risk of dust and air pollution spreading into the surrounding areas, which could pose respiratory health risks, particularly for vulnerable populations such as children and the elderly.

Participants also raised the issue of increased traffic congestion due to the movement of heavy construction vehicles. This, they noted, would not only disrupt regular traffic flow but could also delay access for emergency services and other critical transportation needs. Moreover, there were concerns about potential disruptions to nearby offices and businesses, as well as safety risks to pedestrians and local residents, especially where proper fencing or signage might be lacking.

Another issue discussed was the generation of solid waste from construction debris, which could create sanitation challenges if not well managed. Participants also noted the occupational risks posed to construction workers, particularly if safety measures and equipment were inadequate. Lastly, the group anticipated that access to Ministry services would be reduced during the construction period, and nearby vendors might suffer temporary economic losses due to decreased foot traffic and general disruption in the area.

Significantly, a recurring theme in the discussion was the threat of insecurity and terrorism, especially in the context of a high-profile government facility undergoing redevelopment. Participants warned that construction sites in Mogadishu have, in the past, been vulnerable to targeted attacks, looting and sabotage. The congregation of workers and equipment could become a soft target for terrorist activities, posing grave risks to both labourers and the surrounding population. Concerns also included unauthorized site access, the potential planting of explosives, or armed attacks during or after working hours.



**MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION  
AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS HELD ON 11<sup>TH</sup>  
MAY 2025**

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|  | <p><b>ESIA Response</b></p> <p>In response to the concerns raised by stakeholders, the ESIA Consultant assured participants that all anticipated environmental and social impacts were being thoroughly studied. Comprehensive mitigation strategies are being developed and will be detailed in the Environmental and Social Management Plan (ESMP). The consultant emphasized that these measures are designed not only to minimize adverse impacts but also to safeguard the health, safety, and well-being of workers, surrounding communities, and the environment.</p> <p>To address noise and vibration concerns, the ESMP proposes limiting high noise activities to daytime hours, using modern noise reducing equipment, and installing sound barriers where necessary to shield adjacent properties. Air quality will be managed through regular watering of dusty areas, deployment of dust suppression tools and provision of appropriate personal protective equipment (PPE) such as masks and goggles for workers.</p> <p>A robust traffic management plan will be implemented, which includes temporary rerouting of delivery vehicles, clearly marked pedestrian walkways and coordination with local traffic authorities to ease congestion. For waste management, the plan includes on-site segregation and collection of debris, with disposal handled by certified waste management companies to ensure environmentally responsible practices.</p> <p>Worker safety will be prioritized through the enforcement of occupational health and safety standards. This includes conducting safety training, erecting clear signage, ensuring proper site supervision, and establishing well-equipped first-aid stations. To maintain access to essential services, a temporary offsite public service center will be set up to ensure the Ministry's services remain available throughout the construction period.</p> <p>Environmental monitoring will be conducted routinely to track levels of dust, noise, and emissions, ensuring they remain within acceptable regulatory</p> |
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**MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS HELD ON 11<sup>TH</sup> MAY 2025**

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|          | <p>limits. These measures aim to uphold regulatory compliance and foster trust with the affected community throughout the project lifecycle.</p> <p>In addition to the outlined mitigation measures, the ESIA Consultant emphasized the importance of maintaining open lines of communication with the public throughout the project. As part of the Environmental and Social Management Plan (ESMP) a Grievance Redress Mechanism (GRM) will be established to ensure that concerns, complaints and suggestions from community members, workers and other stakeholders are received, documented and addressed in a timely and transparent manner.</p> <p>The GRM will provide accessible channels for lodging grievances including a physical complaint box at the site, a dedicated phone line and email contact. Complaints will be logged, investigated and resolved according to a clearly defined process with feedback provided to complainants within a reasonable timeframe. A designated Grievance Officer will be appointed to oversee the process and ensure that recurring issues are analyzed and resolved systematically. This mechanism will not only help to manage conflicts and prevent escalation but also strengthen community confidence in the project's commitment to accountability and inclusivity.</p> <p>The ministry affirmed that security risk assessment is a key component of the Environmental and Social Impact Assessment (ESIA) process and is being addressed through the development of a comprehensive Construction Security Management Plan (CSMP) in collaboration with national and local security agencies.</p> |
| <b>7</b> | <b>Ministry Commitment to Stakeholder Concerns</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|          | <p>Dr representative assured stakeholders of the Ministry's firm commitment to address all issues raised during the engagement. He emphasized that the Ministry would maintain transparent communication throughout the entire project life cycle to keep all parties informed and involved. A dedicated liaison</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

**MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS HELD ON 11<sup>TH</sup> MAY 2025**

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | <p>officer will be appointed to coordinate feedback from both staff and the public, ensuring that concerns are addressed promptly and constructively. The Ministry also pledged to incorporate inclusive design elements into the new building, including universal accessibility features, green infrastructure and designated public engagement spaces that reflect the values of openness and sustainability.</p> <p>Furthermore, Dr. Suleiman reiterated the Ministry's commitment to promoting local development by prioritizing employment opportunities for both skilled and unskilled labour from the surrounding communities during the construction phase. To minimize disruption to services, the Ministry will allocate a budget for the temporary relocation of staff to safe and fully equipped premises, ensuring that operations and public service delivery continue without interruption. He concluded by affirming that all recommendations arising from the Environmental and Social Impact Assessment (ESIA) would be strictly implemented and closely monitored throughout the demolition and reconstruction process, demonstrating the Ministry's accountability and responsiveness to public concerns.</p> <p>He also affirmed that the Ministry will work closely with national security agencies to ensure the safety and protection of all stakeholders throughout the demolition and reconstruction period.</p> |
| <b>8</b> | <b>Next Step and Way forward</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|          | <p>The next steps and way forward for the Ministry of Finance building project were clearly outlined to ensure smooth and transparent progress. The immediate priority is to finalize the Environmental and Social Impact Assessment (ESIA) report and submit it to the Ministry and other relevant regulatory authorities for review and approval. This will be followed by more targeted consultations with various departmental units to support effective planning for staff relocation and minimize operational disruptions.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

**MINUTES OF KEY STAKEHOLDERS' ENGAGEMENT MEETING FOR THE DEMOLITION AND CONSTRUCTION OF THE MINISTRY OF FINANCE HEADQUARTERS HELD ON 11<sup>TH</sup> MAY 2025**

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | <p>Once the architectural design receives formal approval, the procurement process will commence to identify and contract a qualified construction firm to undertake the demolition and reconstruction works. In the interim, an open channel of communication will be maintained to facilitate continuous feedback, grievance redress and public monitoring throughout the project.</p> <p>Additionally, the Ministry will develop and launch a comprehensive relocation and communication plan before any demolition activities begin, ensuring that staff and the public are well-informed and adequately prepared. Follow-up stakeholder engagement meetings will be scheduled and held during key project milestones to provide progress updates, gather input and reinforce stakeholder participation in the project's successful implementation.</p> |
| <b>9</b> | <b>Closing and Adjournment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|          | <p>The meeting concluded at 3:30 P.M with a vote of thanks from the ESIA Lead Consultant and the Director General, Dr. Suleiman Omar Hassan. Participants were encouraged to stay actively involved and to share further input through official communication channels.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|          | <b>Confirmation of Minutes</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|          | <p>Minutes Prepared by :Alifatah Abdi Hassan<br/>Date:12/05/2025</p> <p>Minutes Confirmed by: Suad Egal<br/>Date:12/05/2025</p> <p>Position: Project Coordinator – ISEGP</p> <p>Signature: </p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

**Meeting attendance sheet below.**



| 11 May 2025<br>MINISTRY OF FINANCE HEADQUARTER |                    |        |                       | Ministry of Finance Headquarters Building Demolition and Reconstruction project<br>Stakeholder Engagement Attendance Sheet Ministry of Finance staff |                        |            |                                                                                   |
|------------------------------------------------|--------------------|--------|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------------|-----------------------------------------------------------------------------------|
| No                                             | Name               | Gender | Designation           | Position Title                                                                                                                                       | Email                  | Phone      | Signature                                                                         |
| 1                                              | Saleemah           | M      | MOF- Director General | Director General                                                                                                                                     | dpg@mo-f.gov.eg        | 067777363  |  |
| 2                                              | Dan Muhamje        | M      | MOF (Budget Dir.      | TA PBB/COR                                                                                                                                           | danmuje@ychoo.com      | 0619153219 | DMU                                                                               |
| 3                                              | Zakaria SH MOHAMED | M      | MOF- Budget Director  | CF Statistics Officer                                                                                                                                | FURR2001@gmail.com     | 0610339070 | Zakaria                                                                           |
| 4                                              | Amr Yasin          | M      | MOF- Budget Dir       | Head of Security Budget                                                                                                                              | Amr.fanah@gmail        | 61583528   | Amr                                                                               |
| 5                                              | Ismail HASAN       | M      | MOF Budget Dir        | Capital Project Officer                                                                                                                              | 15kshnc@gmail.com      | 615934444  | Ismail                                                                            |
| 6                                              | Nohamed Hassan     | M      | MOF Budget            | SFO Capital Budget                                                                                                                                   | SulheanK313@gmail.com  | 0612264111 | Nohamed                                                                           |
| 7                                              | Abdullahid Alkan   | M      | MOF Budget            | Head of Intergovernment                                                                                                                              | nugaealaw20@gmail      | 619153771  | Abdullahid                                                                        |
| 8                                              | Nafsa Dayis madina | F      | MOF Budget            | GFs                                                                                                                                                  | rafundayibmawlin@gmail | 061080815  | Nafsa                                                                             |
| 9                                              | Mohamed Hassan     | M      | MOF / NAD             | Mudax Xarir Ka                                                                                                                                       | gacat3535@gmail        | 0615431962 | Mohamed                                                                           |
| 10                                             | Abdulkadir Abdi    | M      | MOF / NAD             | Officer                                                                                                                                              | Abdika dir Abdalimaa   | 615668306  | Abdulkadir                                                                        |
| 11                                             | Mohamed Hassan     | M      | MOF / NAD             | Officer                                                                                                                                              | Mbaradici@gmail        | 0612923635 | Mohamed                                                                           |
| 12                                             | Mohamed Hassan     | M      | MOF / EPPD            | Officer                                                                                                                                              | Mackler Jachice@gmail  | 61907496   | Mohamed                                                                           |
| 13                                             | Abdullahid Alkan   | M      | MOF / EPPD            | Head Section Economic & Fiscal                                                                                                                       | ABDIFATAH.ABDO@gmail   | 0615208703 | Abdullahid                                                                        |
| 14                                             | Mohamed Hassan     | M      | MOF / EPPD            | TA                                                                                                                                                   | hassan.mohamed@gmail   | 613309892  | Mohamed                                                                           |
| 15                                             | Fatima Abdalim     | F      | MOF / EPPD            | H. E                                                                                                                                                 | elegantad@gmail        | 616558885  | Fatima                                                                            |
| 16                                             | Nuseen Nor         | M      | MOF / HR              | Off-employee                                                                                                                                         | Bilal6667@gmail        | 5716672    | Nuseen                                                                            |
| 17                                             | Chetan Usaktha     | M      | MOF / HR              | Off-employee                                                                                                                                         | aaclanamin143@gmail    | 5800611    | Chetan                                                                            |
| 18                                             | Abdismud Mohamed   | M      | MOF / HR              | Head of Performance                                                                                                                                  | aaclanamin143@gmail    | 5800611    | Abdismud                                                                          |
| 19                                             | Fatima Idiris m.   | F      | MOF / HR              | Off-employee unit                                                                                                                                    | FatimaIdiris@gmail     | 61303526   | Fatima                                                                            |
| 20                                             | Ahmed Nor          | M      | MOF / HR              | Advisor                                                                                                                                              | panato8@gmail          | 61573591   | Ahmed                                                                             |

30



## Appendix 9: Environmental and Social Impacts Screening Checklist / Questionnaire

Project Title: Demolition and Reconstruction of the Ministry of Finance Headquarters

Location: Mogadishu

**Name of Site: Ministry of Finance Compound**

| # | Category                             | Question                                                                       | Yes                      | No                       | Explanation |
|---|--------------------------------------|--------------------------------------------------------------------------------|--------------------------|--------------------------|-------------|
| 1 | Socioeconomic /<br>Cultural Heritage | Are there any cultural heritage centers nearby the MoF site?                   | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 2 | Socioeconomic /<br>Cultural Heritage | Will the project affect any historical monuments or landmarks?                 | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 3 | Socioeconomic /<br>Cultural Heritage | Are there known heritage or religious features within or near the site?        | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 4 | Air Quality                          | Are there sensitive receptors (e.g., hospitals, schools, offices) nearby?      | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 5 | Air Quality                          | Are there risks of dust and emissions from demolition/construction activities? | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 6 | Air Quality                          | Will changes in air quality impact workers or surrounding residents?           | <input type="checkbox"/> | <input type="checkbox"/> |             |

| #  | Category                     | Question                                                                        | Yes                      | No                       | Explanation |
|----|------------------------------|---------------------------------------------------------------------------------|--------------------------|--------------------------|-------------|
| 7  | Gender and Vulnerable Groups | Are there activities that both women and men rely on in the project area?       | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 8  | Gender and Vulnerable Groups | Could the project lead to Gender-Based Violence (GBV) or exploitation?          | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 9  | Gender and Vulnerable Groups | Are vulnerable groups (e.g., women, PWDs, youth) at risk of exclusion or harm?  | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 10 | Land Use                     | Is the land publicly or privately owned?                                        | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 11 | Land Use                     | What is the current land use of the project area? (Gov't use, open space, etc.) | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 12 | Landscape and Visual Effects | Will existing structures be demolished?                                         | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 13 | Landscape and Visual Effects | Will significant excavations, earthworks, or terrain changes occur?             | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 14 | Landscape and Visual Effects | Will adjacent buildings be affected visually or structurally?                   | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 15 | Landscape and Visual Effects | Will construction generate large volumes of solid waste or soil erosion?        | <input type="checkbox"/> | <input type="checkbox"/> |             |



| #  | Category                      | Question                                                                    | Yes                      | No                       | Explanation |
|----|-------------------------------|-----------------------------------------------------------------------------|--------------------------|--------------------------|-------------|
| 16 | Noise and Vibrations          | Are there potential negative effects from construction noise or vibrations? | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 17 | Noise and Vibrations          | What sensitive facilities (e.g., courts, offices) may be affected?          | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 18 | Noise and Vibrations          | Will hazardous substances be stored or transported on-site?                 | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 19 | Markets and Livelihoods       | Are there any markets or informal vendors near the project site?            | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 20 | Markets and Livelihoods       | Could the project disrupt economic activities (trading, kiosks, etc.)?      | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 21 | Markets and Livelihoods       | Could access to government services or facilities be impacted?              | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 22 | Demographics and Social Risks | Will the project cause labour influx from outside the community?            | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 23 | Demographics and Social Risks | Are there risks of child labour or forced labour during construction?       | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 24 | Demographics and Social Risks | Is there a risk of community conflict or social disruption?                 | <input type="checkbox"/> | <input type="checkbox"/> |             |

| #  | Category                      | Question                                                                | Yes                      | No                       | Explanation |
|----|-------------------------------|-------------------------------------------------------------------------|--------------------------|--------------------------|-------------|
| 25 | Demographics and Social Risks | Are there any health or safety hazards to the local population?         | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 26 | Ecology and Soil Conservation | Will vegetation or green areas be cleared?                              | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 27 | Ecology and Soil Conservation | Could soil degradation or erosion occur on site?                        | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 28 | Ecology and Soil Conservation | Is there a water body nearby that may be impacted?                      | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 29 | Fauna and Flora               | Are there animal species (e.g., birds) that inhabit the site?           | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 30 | Fauna and Flora               | Will demolition/construction disturb any known flora or fauna habitats? | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 31 | Water Quality and Drainage    | Are there risks of water pollution or blocked drainage?                 | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 32 | Water Quality and Drainage    | Could runoff from the site affect public health or water bodies?        | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 33 | Water Quality and Drainage    | Is there a risk of stagnant water accumulation?                         | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 34 | Utilities and Infrastructure  | Will the project disrupt utilities (electricity, fiber, water lines)?   | <input type="checkbox"/> | <input type="checkbox"/> |             |
| 35 | Utilities and Infrastructure  | Will worker accommodation or service amenities be required?             | <input type="checkbox"/> | <input type="checkbox"/> |             |

| #  | Category                     | Question                                                        | Yes                      | No                       | Explanation |
|----|------------------------------|-----------------------------------------------------------------|--------------------------|--------------------------|-------------|
| 36 | Utilities and Infrastructure | Will temporary or permanent relocation of services be required? | <input type="checkbox"/> | <input type="checkbox"/> |             |



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