FEDERAL GOVERNMENT OF SOMALIA

Ministry of Finance (MoF)

PROJECT: Somalia Crisis Recovery Project (SCRP)

PROJECT ID- P173315

Environmental and Social Management Plan (ESMP)

Rehabilitation of Far Libaax Road
Beledweyne District, Hirshabelle State

31 March 2022

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

Content

CONTENT 2

LIST OF ACRONYMS AND ABBREVIATIONS 6

EXECUTIVE SUMMARY 8

1. INTRODUCTION 10

1.1 Project Background 10

1.2 Purpose of the ESMP 11

2. POLICY AND LEGAL FRAMEWORK 1

2.1 National Regulatory and Policy Framework 1

2.2 International Conventions Signed and Ratified by Somalia 3

2.3 World Bank Environmental and Social Standards (ESS) 5

2.4 Legal Gap Analysis 7

3. BIOPHYSICAL AND SOCIO-ECONOMIC ENVIRONMENT 15

3.1 Proposed Project Location 15

3.2. Topography, Geology and Soil 16

3.3 Water Resources and Hydrology 17

3.4 Climate 18

3.5 Fauna and Flora 21

3.6. Transport 22

3.7. Socio-Economic Environment 22

3.8. Land Use 24

3.9. Population Profile 25

3.10 Administration and Governance 26

3.11 Social Services 27

4. PROJECT DESCRIPTION 29

4.1 Project Selection 29

4.2 Proposed Intervention 30

4.3 Project Activities 30

5. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS 34

5.1 Positive Impacts 34

5.2 Negative Risks and Impacts 34

6. ENVIRONMENTAL AND SOCIAL MITIGATION MEASURES AND MONITORING PLAN 36

7.INSTITUTIONAL ARRANGEMENTS AND RESPONSIBILITIES 49

7.1 Government Institutions 49

7.2 Contractor 50

8. REPORTING ON ESMP COMPLIANCE 52

9. CAPACITY BUILDING AND TRAINING 54

9. STAKEHOLDER CONSULTATIONS 55

10. GRIEVANCE REDRESS MECHANISMS 59

11. IMPLEMENTATION BUDGET 60

12. CONCLUSIONS 61

REFERENCES 62

ANNEX 1: COMMUNITY CONSULTATIONS 63

ANNEX 2: GRIEVANCE REDRESS MECHANISMS 64

GRM Objectives 64

Available Channels 65

Processing Steps 66

Response Times 68

Other Redressal options 68

ANNEX 3: ENVIRONMENTAL AND SOCIAL MONITORING TEMPLATE 70

ANNEX 4: CODE OF CONDUCT FOR WORKERS 71

ANNEX 5: CHANCE FIND PROCEDURES 75

List of Figures

Figure 1 Map showing location of Beledweyne in Somalia in a region called Hiiraan 15
Figure 2 The black line starting at F1 to F8 mark the 2km Far Libaax Road proposed for rehabilitation in Beledweyne District 16
Figure 3 An extract of the geological map of Central Somalia 17
Figure 4 section of the Far Libaax road in Beledweyne District 18
Figure 5 Weather by Month in Beledweyne District 19
Figure 6 Average monthly temperature and precipitation of Beledweyne 19

Figure 7 Rainfall as a % of normal (March 1st to May 5th compared to 1981/2010 average) 20
Figure 8 Map of Somalia showing Beledweyne region affected by riverine floods 21
Figure 9 Faar Libax Road 22
Figure 10 Map showing intensive agriculture and transport system in the southern region 25
Figure 11 Asphalt concrete pavement 31
Figure 12 Typical design cross sections of Far Libaax Road 31
Figure 13 Longitudinal and Cross sections of a typical culvert 32
Figure 14 District and Community leaders' consultation 58

List of Tables

Table 1 GAP Analysis World Bank ESS and National Legal Framework 7
Table 2 Population profile of Hiraan State 25
Table 3 Environmental & Social Management Plan: Rehabilitation of Faar Libax ROad 37
Table 4 Institutional partners' responsibilities 49
Table 5 Implementation Budget 60
Table 6 Types of Complaints expected 64
Table 7 GRM Actions 67
Table 8 GRM Response Times 68

LIST OF ACRONYMS AND ABBREVIATIONS

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

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

Executive Summary

The proposed Project aims to rehabilitate parts of Far Libaax Road in Beledweyne District, Hirshabelle State. The district is approximately 50km^2 and located on the flood plains of the Shebelle River, a perennial river whose origins can be traced further north in the Ethiopian highlands. Far Libaax Road traverses an area with two different land uses. The first 800m section is in Beledweyne town with residential and commercial buildings along the road. The next 1.2 km pass through an uninhabited area. The proposed intervention for the first section is a paved road to bitumen standards, while the remaining section is gravel surfacing.

The proposed intervention will improve the road profile, road pavement and the surfacing, and the drainage provisions of Faar Libax Road. The semi-urban part of the road will be paved to bitumen standards while the remaining section extending to the rural area will be rehabilitated, but with gravel surfacing, as agreed with the client.

The proposed rehabilitation will scarify the existing road up to 150mm and compact it to form the subgrade. This will be followed by a gravel subbase layer, improved gravel base layer, and asphaltic concrete surfacing for the semi-urban section. On the remaining 1.2 km, a 300mm layer of base quality gravel (laid in two layers) will be laid on the subgrade and will also form the surfacing.

This Environmental and Social Management Plan (ESMP) specifies the means through which the adverse environmental and social risks and impacts of the Project associated with pre-construction, construction and operational activities are either avoided or mitigated. It aims to identify, characterize and manage the potential risks and impacts in the road rehabilitation of Far Libaax Road in Beledweyne. The ESMP lists the project-specific risks and impacts and mitigation measures, layout institutional arrangements for implementing and monitoring the risk mitigation measures and proposes monitoring indicators for measurement and monitoring of E&S performance.

There are significant positive impacts that are expected from the project. The primary beneficiaries are populations in rural areas, including farmers, agro-pastoralists, pastoralists, and rural IDPs that benefit due to improved access to the urban centers for social services, access to livelihood opportunities and economic gains. The improved roads would lead to savings in travel time and vehicle maintenance costs that could benefit the rural population..

The activities associated with the rehabilitation of Far Libaax Road will likely generate adverse site-specific risks and impacts. Most of these are related to typical risks and impacts in civil works, for example, risks related to disposal and management of large amounts of excavated material generated from construction activities during the construction phase, occupational health and safety of workers both during the construction and operational phases, increased level of dust, noise and vibration from moving of construction vehicles and machinery, community health and

safety risk, risks associated with labor rights and management, e.g. child labor or forced labor, labor influx and associated risks such as GBV/SEAH, and others.

This ESMP lays out the specific adverse risks and impacts anticipated for the project, lays out the respective mitigation measures, and lists monitoring responsibilities. It shows exactly what must be done, by whom, when, and to what standard; and also shows who will monitor its implementation and when, and what the budget implications for both, mitigation measures and monitoring activities are. It further includes a description of the Project Grievance Redress Mechanism (GRM), which needs to be applied during the construction period, and reiterates stakeholder consultations that have been conducted in the lead up to the project design.

1. Introduction

1.1 Project Background

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

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

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

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

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

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

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

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

The proposed sub-project for the rehabilitation of Far Libaax Road will be implemented under component 2 - medium-term flood recovery - which supports the rehabilitation of critical infrastructure in line with build-back better and climate-resilient standards. The Far Libaax Road has been selected in consultation with the State and local government partners, community stakeholders and also taking into consideration component 2 eligibility.

The project team has undertaken an E&S[1] screening of the sub-project, as per process described in the SCRP ESMF[2]. The screening resulted in placing the sub-project into 'Category C: Moderate Risk', as per the levels defined in the ESMF. It was decided that an ESMP would best guide the risk management for the sub-project.

1.2 Purpose of the ESMP

The ESMP lists the key elements of an Environmental and Social Management Plan (ESMP) capturing the typical environmental and social (E&S) risks and impacts and associated mitigation measures that need to be considered at minimum in the context of rehabilitation activities of Far Libaax Road. The purpose of the management plan is to provide a consolidated summary of all the Environmental and Social (E&S) commitments relevant for the construction phase of the project. The measures focus on environmental aspects such as air emissions, environmental contamination and social aspects such as communication with local stakeholders and safety of workers and communities. The ESMP lists the project-specific risks and impacts and mitigation measures, lays out the institutional arrangements of the implementation and monitoring of the risk mitigation measures, and proposes monitoring indicators for measurement and monitoring of E&S performance.

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

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

[2] Ministry of Finance, Somalia Crisis Recovery Project, Environmental and Social Management Framework (ESMF), disclosed at: https://www.cabri-sbo.org/uploads/files/Covid19BudgetDocuments/Somalia_2020_Planning_External_NationalPlan_MinPlanning_CEN-SADIGAD_English.pdf

2. Policy and Legal Framework

2.1 National Regulatory and Policy Framework

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

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

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

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

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

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

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

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

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

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

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

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

In regards to the institutional capacity for environmental management, a Directorate of Environment is integrated in the Office of the Prime Minister. It is mandated to draft relevant

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

policies and legislation, including establishing of the Environmental Quality Standards, and Sectoral Environmental Assessments, Environmental Impact Assessments (EIA). Laws on environmental governance in Hirshabelle are at infancy stages and environmental impact assessment capacity is nascent. Environmental decision-making arrangements includes the FGS signing international conventions, and parliament approving Environmental Acts and Laws. However, necessary laws have not been formulated yet.

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

2.2 International Conventions Signed and Ratified by Somalia

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

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

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

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

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

Convention on the Rights of the Child: The Convention on the Rights of the Child from 1989 is the most comprehensive compilation of international legal standards for the protection of the human rights of children. It acknowledges children as individuals with rights and responsibilities according to their age and development, as well as members of a family or community. This includes non-discrimination, the best interest of the child, the right to life, survival and development and the right to participation. Somalia ratified the Convention in 2015.

Constitution of the International Labor Organization: The constitutional principle is that universal and lasting peace can be established if it is based on social justice. The ILO has generated such

hallmarks of industrial society as the eight-hour work day, maternity protection, child labor laws, and a range of other principles. Somalia has been a member of the ILO since 1960.

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

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

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

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

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

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

2.3 World Bank Environmental and Social Standards (ESS)

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

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

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

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

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

[4] ESS 7-9 do not apply to this project. There are no population groups that are included in the relevant criteria of ESS 7, and there is no cultural heritage findings expected.

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

with particular attention to people who, because of their particular circumstances, may be vulnerable. Risk mitigation measures are listed in this ESMP.

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

2.4 Legal Gap Analysis

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

Table 1 GAP Analysis World Bank ESS and National Legal Framework

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

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

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

	hours per week are 8 hours per day and 6 days per week.		
	The Labour Code of 1972. Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.	n/a	The Project will only allow deployment from the age of 15 (see LMP).However, children under 18 are not to be considered for hazardous work and the work cannot interfere with their education or be harmful for their health.
	The Labour Code of 1972. The Labor Code forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children.	Children are deployed in worst forms of child labor (forced recruitment by army, forced labor in domestic work, agriculture and herding, breaking rocks for gravel, construction work, commercial sexual exploitations) However, Somalia made efforts to construct a rehabilitation center for former child combatants and establish a Human Trafficking and Smuggling Task Force. Children are further deployed in agriculture (farming, herding livestock, fishing); industry (construction, mining and quarrying); services (street work, working as maids in hotels, domestic work, voluntary recruitment of children by army); children also perform dangerous tasks in street work Laws do not identify hazardous occupations or activities	The Project will only allow deployment – in all project worker categories – from the age of 18 (see LMP). Rigorous monitoring will ensure the application of the LMP.

		prohibited for children, and child trafficking for labor and commercial sexual exploitation is not criminally prohibited. Government does not employ labor inspectors and conducts no inspections.	
	The Labour Code of 1972. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade union.	n/a	The project will follow national law and ESS 2.
ESS 3: Resource Efficiency and Pollution Prevention and Management			
The Objectives of ESS 3 are: To promote the sustainable use of resources, including energy, water and raw materials. To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. To avoid or minimize project-related emissions of short and long-lived climate pollutants. To avoid or minimize generation of hazardous and non-hazardous waste.	Provisional Constitution of the Federal Republic of Somalia. Somalia passed its Provisional Constitution in 2012. Article 12 of the Constitution addresses public assets and natural resources. Provisional Constitution of the Federal Republic of Somalia. Article 25 of the Constitution states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials.	Laws in support of the Constitution are still not available. Implementation of the laws and Constitution may be hampered due to the weak justice system	The Project will promote the sustainable use of resources and avoid or minimize adverse impacts on human health according to the Constitution and the WB's ESS3. Detailed measures are laid out in this ESMP

	Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.		
	Provisional Constitution of the Federal Republic of Somalia. Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. All people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment. The FGS and the governments of the FMS affected by environmental damage shall take urgent measures to clean up hazardous waste dumped on the land or in the waters of the FGS; take necessary measures to reverse desertification, deforestation and environmental degradation, and to conserve the environment and prevent activities that damage the natural resources		

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

			contractors will develop road safety management plan and a Health and Safety Plan as part of the CESMP to address the impacts on local communities of moving construction equipment; measures and actions developed to assess and manage specific risks and impacts outlined in the ESMPs.
ESS 10: Stakeholder Engagement and Information Disclosure			
The Objectives of ESS 10 are: To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance. To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.	Provisional Constitution of the Federal Republic of Somalia. Article 32 stipulated that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information	The law on the right of access to information currently only exists as a draft	The sub-project has implement stakeholder consultations and will continue to do so The SCRP GRM is implemented in the sub-project area

3. Biophysical and Socio-Economic Environment

This section describes the overall baseline condition of Somalia, and Beledweyne District in Hirshabelle State in specific, in terms of biophysical environment, as well as the socio-economic background. The target location is the actual site where the Faar Libaax Road is located, in Beledweyne District. Beledweyne District is the capital of the Hiran region, in Central Somalia. The biophysical environment of the road is in principle similar to that generally obtained in Somalia, with minor variations.

3.1 Proposed Project Location

The proposed project is located along the northwestern border of Somalia with Ethiopia, in Beledweyne District, Hirshabelle State. The district is approximately 50km^2 and is primarily located on the flood plains of the Shebelle River, a perennial river whose origins can be traced further north in the Ethiopian highlands. Figure 1 below shows the location of the proposed project location, the Far Libaax Road in Beledweyne District. Due to its geographical location, Beledweyne has strategic importance because it is located on the main road that crosses the country and connects Mogadishu to the rest of the central regions of Somalia.

The district consists of four urban villages namely: Bundoweyn, Howlwadag, Haawo Taako and Kooshin. The first two villages are located on the south side of Shabelle River, and the last two are on the north side. Figure 1 below shows the location of Beledweyne District in Hirshabelle State of Somalia.

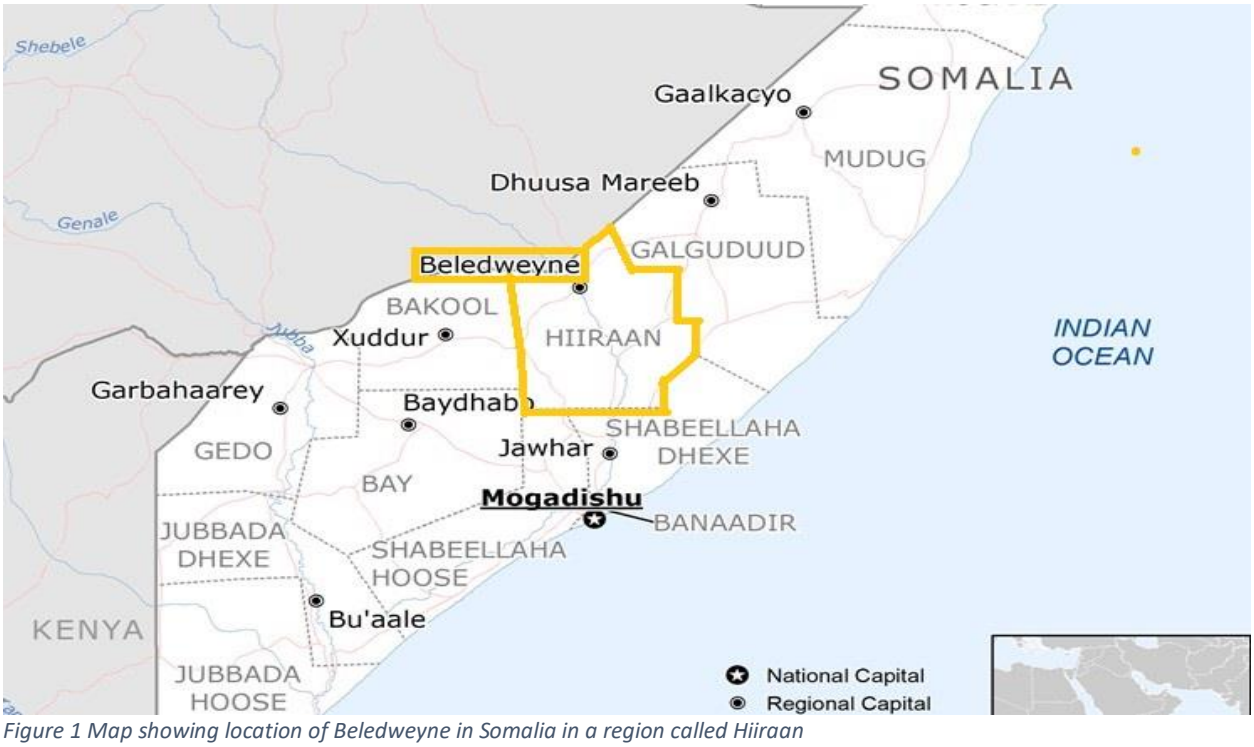

Figure 1 Map showing location of Beledweyne in Somalia in a region called Hiiraan

Figure 2 The black line starting at F1 to F8 mark the 2km Far Libaax Road proposed for rehabilitation in Beledweyne District

3.2. Topography, Geology and Soil

Topography: Beledweyne town sits on the floodplains of Shebelle River at an altitude ranging from 180m asl to 200m asl. Haawa Taako HCF is at an altitude of 182m asl. The area is generally flat and sits within the riverine area of Shebelle River, as shown in the google map above. Most of the town is on the flood plain and is flat. The soils within the town are generally expansive.

Geology and Soil: Key formations in Somalia include alluvium from the Pleistocene to Holocene period whose general characteristic show Older Pleistocene alluvial sediments and recent alluvium, including sandy clay with lenses of sand and fine gravel to coarse gravels and boulders. The regional geology of the Beledweyne area comprises Beledweyne limestone with silty clays or red hard to stiff clays overlying the rocks. An extract of the geological map of the area is shown in the Figure below.

In some parts of the country are fine sands forming dunes and red soils and calcarenite. Quaternary
unconsolidated sediments are mostly found in the southern coast and the riverine areas of Southern Somalia, which include Beledweyne City.

The Mudug formation, found in the Beledweyne area, comprises of marly and biogenic limestones, calcarenites and sandstones. On the western side of this corridor, the Beledweyne formations consist of gypsum, marls and dolomites. The soils in the area are Fluviol around the riverine area of Beledweyne and then briefly change into Arenosols. The remainder of the city of Beledweyne is made up Gypsisols.

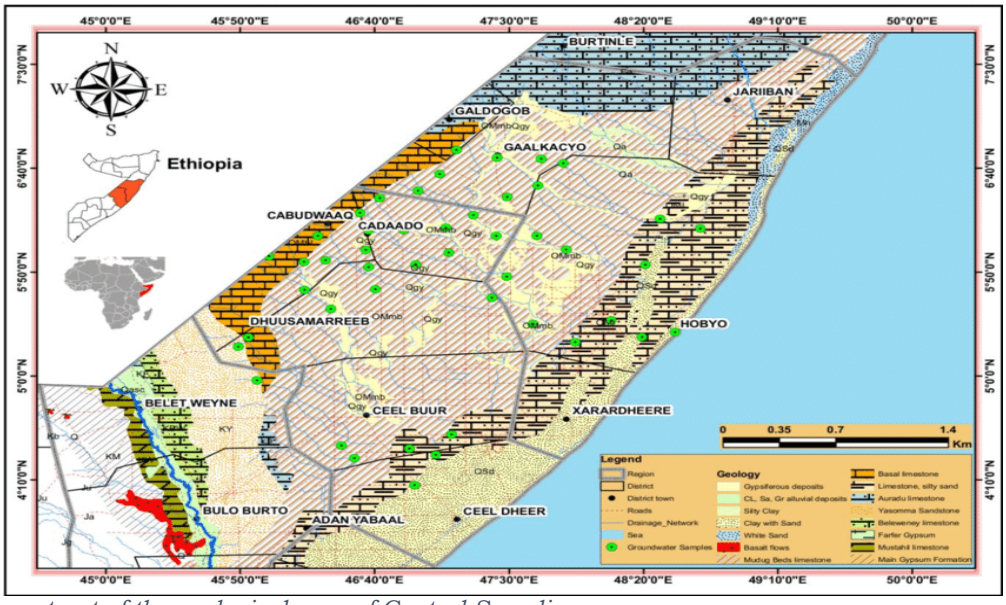

Figure 3 An extract of the geological map of Central Somalia

As part of the road design process, soil samples along Far Libaax road were collected and laboratory tests were performed. The test results indicate that the natural soils along Far Libaax road can be described as low to high plasticity clayey sands and silty sands. The soil is rated A-6, fair to poor, according to the AASHTO Standards (American Association of State Highway and Transportation Officials Standards) soil classification system.

3.3 Water Resources and Hydrology

Groundwater is of significant importance in Somalia. Apart from the areas along the Shabelle Rivers, all regions depend on groundwater for domestic water supply, livestock and small-scale irrigation. River Shebelle is the primary sources of surface water in Beledweyne District. It is a perennial river that originates from the Ethiopian highlands in the north and flows southwards towards the Indian Ocean. The proposed road work has no impact on the river as it does not alter the existing drainage regime. The river is located about 500m away at its nearest point to the road, as shown in Figure 3-1.

Groundwater quality is a major issue. Most groundwater sources have salinity levels above 2,000 µS/cm. Many shallow wells are also unprotected and vulnerable to microbiological and other contamination (FAO/ 2012).

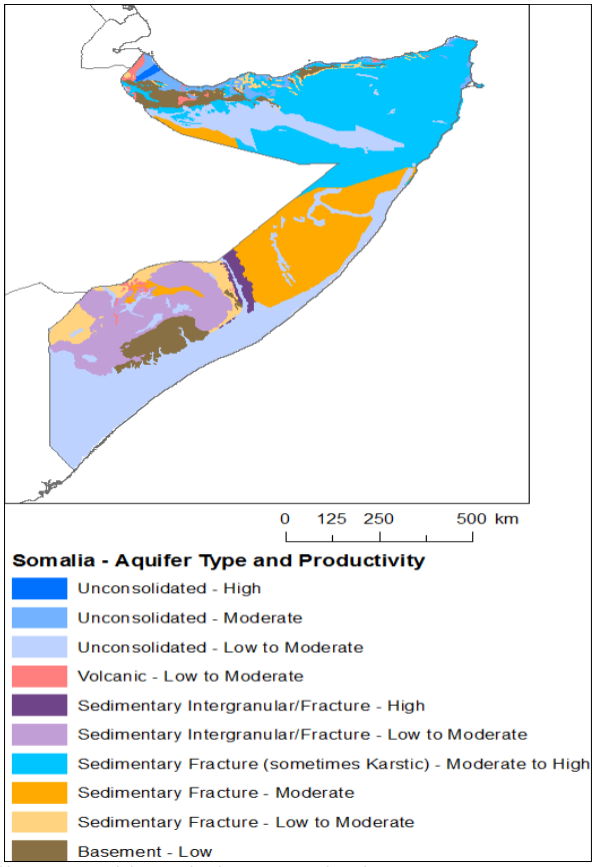

Figure 4 section of the Far Libaax road in Beledweyne District

3.4 Climate

The Inter-Tropical Convergence Zone (ITCZ) influences Somalia's climate and varies from arid to semi-arid and from tropical to sub-tropical depending on the spatial location.

Hirshabelle State had a poor 2018 Deyr and an abnormally hot 2019 Jilaal seasons. Additionally, the rains were too late for late planted crops to perform well, and the livestock needed more seasons to recover and breed. On average, the highest temperatures were recorded in March and September of around 35°C, and the lowest temperatures recorded during the months of December and January, of around 22°C, as demonstrated in the graph below.

Located at an elevation of 184m above sea level, Beledweyne has a Subtropical steppe climate. The district's yearly temperature is 30.41ºC and it is 2.5% higher than Somalia's averages. Beledweyne typically receives about 59.0 millimeters (2.32 inches) of precipitation and has 71.36 rainy days (19.55% of the time) annually.

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Nov	Oct	Dec	Year
Record high °C (°F)	37.48 (99.46)	38.49 (101.28)	40.52 (104.94)	39.51 (103.12)	38.49 (101.28)	37.48 (99.46)	36.47 (97.65)	37.48 (99.46)	39.51 (103.12)	38.49 (101.28)	35.45 (95.81)	36.47 (97.65)	40.52 (104.94)
Average high °C (°F)	34.69 (94.44)	36.21 (97.18)	37.26 (99.07)	35.94 (96.69)	34.91 (94.84)	34.18 (93.52)	33.18 (91.72)	33.98 (93.16)	35.56 (96.01)	33.83 (92.89)	33.32 (91.98)	34.14 (93.45)	34.77 (94.59)
Daily mean °C (°F)	29.35 (84.83)	30.36 (86.65)	31.81 (89.26)	31.96 (89.53)	31.31 (88.36)	30.42 (86.76)	29.3 (84.74)	29.72 (85.5)	30.85 (87.53)	30.32 (86.58)	29.75 (85.55)	29.74 (85.53)	30.41 (86.74)
Average low °C (°F)	21.84 (71.31)	21.94 (71.49)	23.83 (74.89)	25.98 (78.76)	25.64 (78.15)	24.18 (75.52)	23.24 (73.83)	23.28 (73.9)	23.71 (74.68)	24.86 (76.75)	24.36 (75.85)	23.31 (73.96)	23.85 (74.93)
Record low °C (°F)	17.22 (63.0)	16.21 (61.18)	17.22 (63.0)	18.23 (64.81)	23.3 (73.94)	22.29 (72.12)	20.26 (68.47)	19.25 (66.65)	20.26 (68.47)	21.27 (70.29)	20.26 (68.47)	18.23 (64.81)	16.21 (61.18)
Average precipitation mm (inches)	0.58 (0.02)	1.36 (0.05)	30.64 (1.21)	162.51 (6.4)	155.25 (6.11)	8.8 (0.35)	4.41 (0.17)	3.77 (0.15)	9.93 (0.39)	176.45 (6.95)	144.48 (5.69)	9.78 (0.39)	59.0 (2.32)
Average precipitation days (≥ 1.0 mm)	0.18	0.27	2.95	13.62	16.21	2.86	1.38	1.01	2.12	18.88	10.49	1.38	5.95
Average relative humidity (%)	46.62	47.07	49.03	54.91	59.45	55.78	54.72	53.65	52.12	60.14	58.94	47.87	53.35
Mean monthly sunshine hours	11.49	11.69	11.64	12.43	12.65	12.63	12.49	12.59	11.89	11.05	11.1	10.56	11.85

Figure 5 Weather by Month in Beledweyne District

Figure 6 Average monthly temperature and precipitation of Beledweyne

Somalia is one of the countries facing the risk of global warming impacts. In Beledweyne district, severe flooding and frequent droughts undermine both food and livelihood security and affect the overall living conditions of the local community. For the people of Beledweyne experiencing such conditions, leaving these factors unaddressed may result in challenging economic and social conditions. They include worsening drainage systems and deteriorating roads. Far Libaax Road rehabilitation with provisions for improved drainage would provide protection against climate change impacts.

Somalia has been ranked as one of the most vulnerable countries and least prepared to deal with the effects of climate change. Rainfall totals during the first half of the April to June *Gu* season are some of the highest on the 1981-2017 record, equivalent to between 130 and over 200 percent of average (Figure 8).The heavy rainfall marks the end of prolonged drought across much

of the country and is supporting crop development and the regeneration of pasture and water resources. However, the heavy rainfall and subsequent flooding has also led to fatalities, massive displacement, and damage to infrastructure and cropland. Needs are expected to increase in displacement sites and riverine areas in the near term. Beledweyne, the largest city of Hishabelle State, has regularly suffered from devastating floods. However, Far Libaax Road is not subject to river flooding.

Rainfall started in March, two to four weeks earlier than normal, in many areas of Somalia, and heavy rainfall had persisted through early May. In several central, southern, and northwestern regions, the total quantity of rainfall received during the first two months of the season was the highest on record. As a result of heavy rainfall in both Somalia and the neighboring Ethiopian highlands, river water levels increased sharply in mid-April and overflowed river banks. Flooding occurred in several riverine areas of Gedo, Hiraan, Lower and Middle Shabelle, and Lower and Middle Juba. Heavy rainfall also caused flash flooding in Bay and Togdheer. Along the Shabelle River in Wanlawayne and Qoryole, floods destroyed an estimated 30,000 ha of cultivable land, 4,000 ha of which had been cropped.

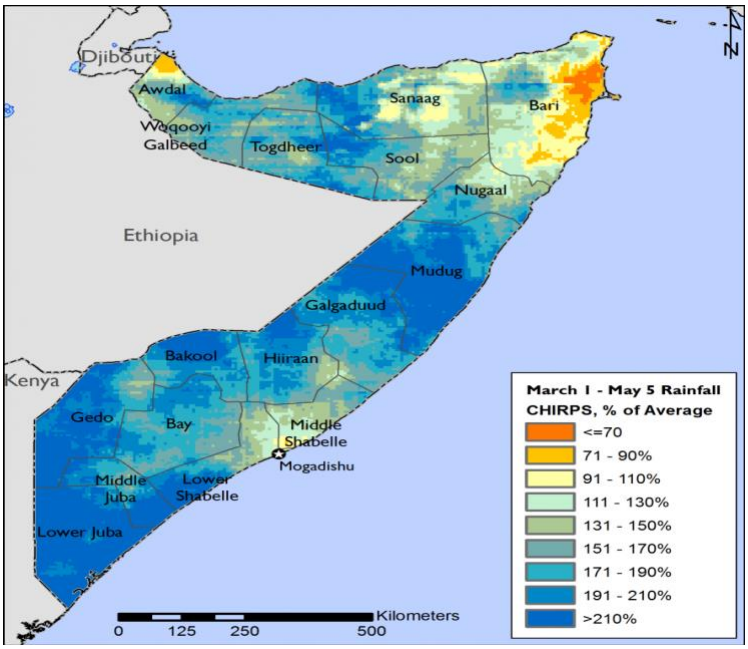

Figure 7 Rainfall as a % of normal (March 1st to May 5th compared to 1981/2010 average)

Of great concern is Hiraan, where flooding displaced approximately 180,000 people, including 22,500 households in Beletweyne town, and destroyed Health Care Facilities, crops, stored commodities, and transportation infrastructure. It was estimated that over 70 percent of farms in riverine areas of Hiraan were inundated.

Source: https://fews.net/east-africa/somalia/alert/may-2018

Beledweyne, the largest city of Hirshabelle State, has regularly suffered from devastating floods. The map provided below shows flood prone regions of Somalia with Beledweyne as one of these regions.

Over the past decade, floods have increased in magnitude and recurrence, reaching alarming levels in 2019, where 68% of the city was flooded. The urban form is defined by the course of the River Shabelle. In the central part of the city, surrounded almost entirely by the meanders of the

river, is one of the densest areas characterized by having the main urban services of the city, such as the hospitals, markets and government facilities. Given its geographical location and the challenges of floods in the area, the city experiences riverine floods, which negatively impact on critical infrastructure. Far Libaax road, however, was found to be not flood-affected by flooding from the Shabelle river but by surface runoff from the catchment area associated with the road.

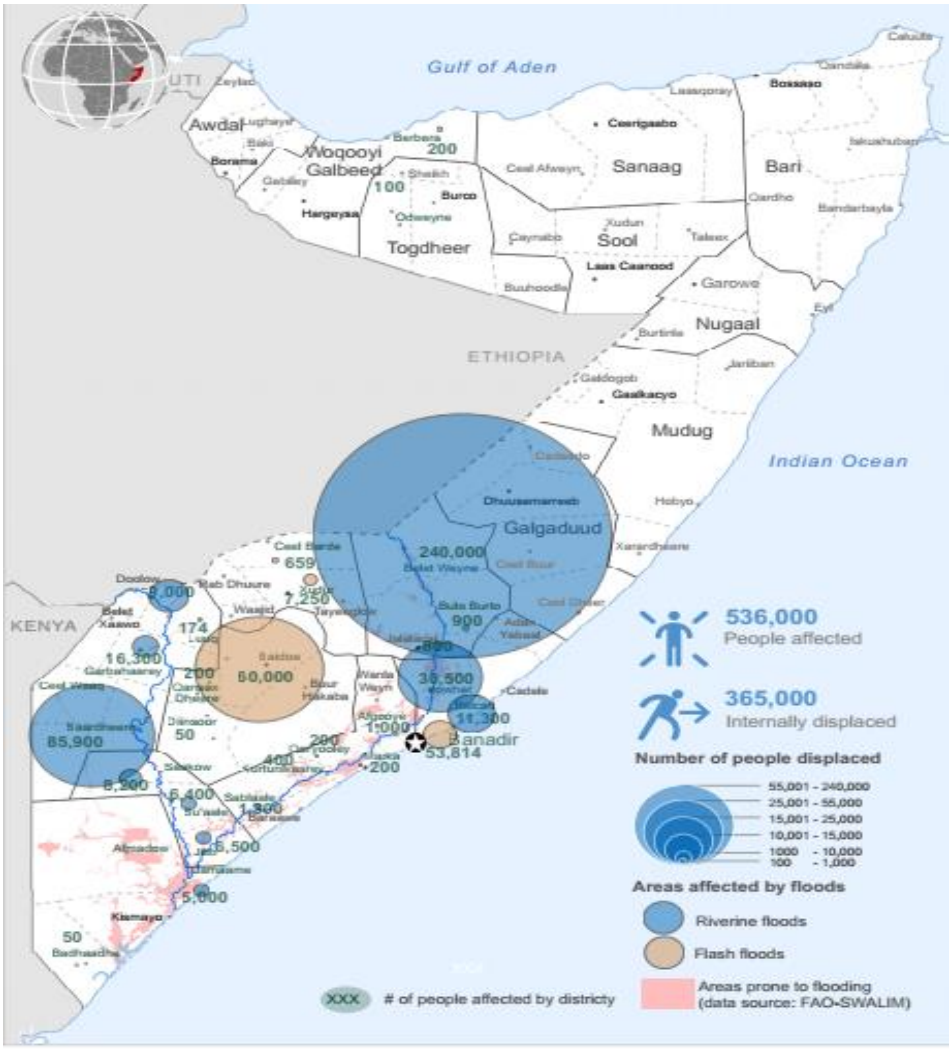

Figure 8 Map of Somalia showing Beledweyne region affected by riverine floods

Source: [Somalia Flood Response Plan, 2020]

3.5 Fauna and Flora

As in other areas of Somalia, Hirshabelle State vegetation is predominantly deciduous bushland and thicket dominated by species of Acacia and Commiphora. Forest growth is limited due to poor soils and low rainfall. The fauna is dominated by several livestock species, including the Somali goat, Somali sheep and dromedary camels. This is due to the largely pastoralist nature of Somali livelihoods. Endemic fauna, such as wild mammals, has largely been diminished through poaching. Giraffes, zebras, and hyenas can still be found. Other endemic mammals include the long naked garanuug (*Litocranius walleri*) (IUCN status: Near Threatened) and the silver dik-dik

(*Madoqua piacentini*) (IUCN status: unknown) and the golden mole (*Calcochloris tytonis*) (some species with IUCN status: Threatened). Reptile species found in Somalia include puff adder snakes (Bitis arietans Somalica) (IUCN status: least concern). Bird species include the ostrich and doves. There are no biodiversity or protected areas in the project area, in Beledweyne town or in Hirshabelle State.

3.6. Transport

Somalia has poor and deteriorating infrastructure. In 1996, there were 22,100 km of roads, of which only 2,608 km were paved. Most of the earth roads are unusable during the rainy season. Highways are so few that they do not link isolated regions of the country. There is also no railway network in the country (Chapin Metz 1992, Advameg 2010).

Far Libaax road is 2km long and is a section of the main road giving access to the western hinterlands, including Far Libaax town and onwards to the Bokool region. The section of Far Libaax Road under this project is affected by local drainage as the existing track does not have drainage provisions. The road is not passable during the rainy season.

Figure 9 Faar Libax Road

This section of the road appears to have been improved as part of the recently constructed gravel road, and the municipality requested for this section to be upgraded to bitumen standards. Currently, the riding surface consists of a layer of un-compacted and ungraded rocky gravel. The alignment, both vertical and horizontal, is not engineered. The road has no side drains or any cross-drainage structures, the reason for the prevailing drainage issue. Far Libaax road has an unoccupied Right-of-Way hence there will be no compensation required as a result of project activities on the same.

3.7. Socio-Economic Environment

The strategic position of the city of Beledweyne on the main infrastructure of the country, the Mogadishu-Bossaso corridor, and close to the main agricultural areas of Bay and Lower Shabelle, and to the border with Ethiopia, makes it a central market for livestock and linked products (meat, milk and ghee), and connecting node to the ports of Bosaso and Berbera, both an export

route port for agricultural products (cereals and legumes) and imported foods that make up a substantial part of the population diet: rice, sugar and vegetable oil, along with other non-food essentials, from soap to clothing.

The territory is also vastly diverse, hosting three of the four broad categories of rural livelihood (Pastoralism, Agropastoralism and Riverine Agriculture) and four of the 18 rural livelihood zones identified in Somalia[6]

Hawd Pastoral
Southern Inland Pastoral
Southern Agropastoral
Juba Shabelle Pump Irrigation

Beledwyne City is representative of the dramatic changes in the lifestyle of Somalis which are also impacting the way they work, live, and settle. For example, pastoralists households whose herds declined due to repeated droughts and other problems turn to agro-pastoralist. On the other side, there is a growing tendency for wealthier pastoralists to settle into fixed houses, where they may own one or several berkads and possibly a tea-shop or small goods store, and from where they send out their animals with family members or herders contracted from less wealthy households, since livestock are still their main wealth. Most of these new and old settlement fall into the "rural" group, without consideration their different patterns or the notable differences in terms of densities, functions and morphology. Far from being an exhaustive sample the Somali territory, the district of Beledweyne offers a glance at the complexity and at the rich variety of human settlements present in the country[7].

Administration and Governance: Hirshabelle State is the youngest state in Somalia. The Beledweyne District Administration is led by a mayor, who was appointed by the Hirshabelle State. She is the first female mayor in Somalia. Beletweyne also has a district council. According to the Fragility Index Maturity Model (FIMM) respondents, the council is representative of local sub-clans. District authorities at times struggle to maintain security and law and order in the town[8]. Local revenue is generated through taxes and registration fees for businesses and NGOs. A Council of Elders exists in Jowhar (the state capital) and is relatively influential, particularly on matters concerning clan conflicts and resource disputes. The council reportedly works with the local government to help with local stability and peace processes. The full council consists of 40 members from a wide range of sub-clans[9]. These local institutions may be able to provide support in potential conflicts or land and resettlement issues.

In the Middle Ages, Beledweyne was part of the influential Ajuran Sultanate, that covered much of southern Somalia and eastern Ethiopia extending from Mareeg in the north to Qelafo in the west and Kismayo in the south. The town later came under the administration of the Hawadle

[6] FSNAU, Somalia Livelihood Profile, 2016
[7] Settlement Pattern in Somalia; A Case Study on Beledweyne District
[8] Fragility Index Maturity Model (FIMM), Round 3 - March 2019
[9] DTTO

Sultanate in the late 17th century after the collapse of the powerful Ajuran Empire. At the turn of the 20th century, Beledweyne was incorporated into the Italian protectorate. After the independence of Somalia in 1960, the city was made the center of the official Beledweyne District. In 2006 the Islamic Courts Union (ICU) assumed control of Beledweyne and other parts of southern Somalia, but the Transitional Federal Government (TFG) supported by troops from Ethiopia and the African Union re-established its authority in the month of December of the year. in 2009, the Islamist al-Shabab militia took the town and imposed new rules. The town was recovered from Al Shabaab by the Somali National Army (SNA) with the help of the African Union Mission in Somalia (AMISOM) in 2012. In 2016, Beledweyne became part of the Hirshabelle State of Somalia.

3.8. Land Use

The settlement patterns across the country are uniform comprising large towns. Between these urban centres are scattered villages and small towns that serve as trade centres for the pastoralist communities. On the riverine parts like in Beledweyne, the communities can be described as agro-pastoralists.

In Somalia, rangelands are estimated to be about 80 per cent of the nation's land area. In Beledweyne, the land is used for grazing and for farming around the Shebelle River. Beledweyne serves the nomadic communities and travelers.

The River Shebelle allows Beledweyne to be a major source of agricultural produce as the river provides the needed water for irrigation. On the other hand, the proximity to the river causes the constant flooding, which regularly damages infrastructure. Agricultural areas are located closely to the river channel to facilitate irrigation.

The maps below show concentration of livelihood activities in Somalia where intensive agriculture is practiced and this is seen to concentrate in the southern region of Somalia. Other areas mostly practice extensive agriculture, which by definition is not as high labor and capital intensive as the former. The second map shows the transport network available in the southern region and the river system available.

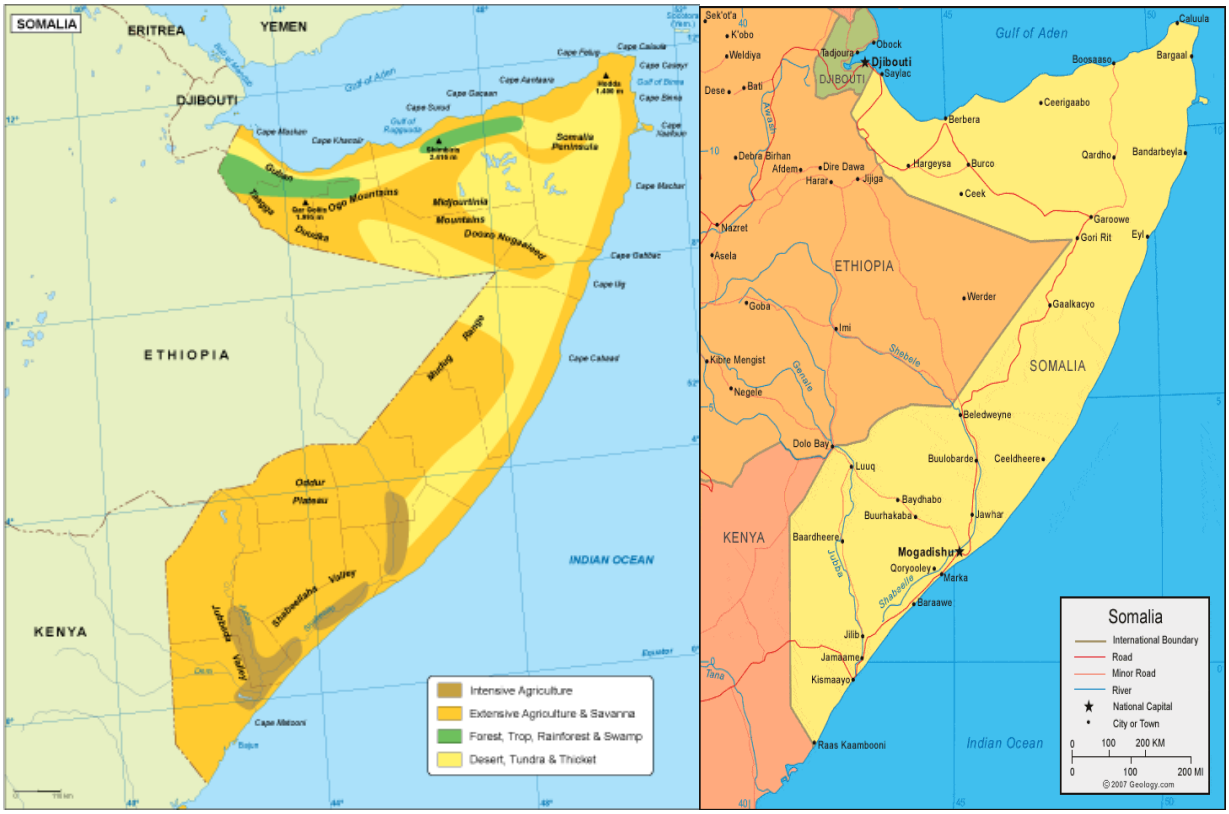

Figure 10 Map showing intensive agriculture and transport system in the southern region

Source: https://geology.com/world/somalia-satellite-image.shtml

3.9. Population Profile

According to the population census conducted by Somali authorities, with support from UNFPA in 2014, it was estimated that the Hiraan Region had a population of 502,685 persons. From these estimates, close to 50% of the population are nomads.

Table 2 Population profile of Hiraan State

Region	Urban	Rural	Nomads	IDPs	Total
Hiraan	81,379	135,537	252,609	51,160	520,685

Source: UNFPA 2014

For what pertains the rural population, it is distributed as the following:

- Southern Agro-Pastoral 96,590
- Riverine Pump Irrigation 18,973
- Hawd Pastoral 36,393
- Southern Inland Pastoral 18,973

More recent projections, relative to 2018, talked about a population 306,594, with an urban population of 111,634 and a non-urban population of 194,960.

According to the PESS, the district in 2014 had 235,214 inhabitants, roughly 2% of the Somali population, with 72.7% in rural and 13.3% in urban areas, as shown in the table below.

Region	Urban	Rural	IDPs	Total
Beledweyne City	31,410	170,930	32,410	235,214

The major clans in the district are mostly Hawiye, including Hawadle, Galjecel, Jejele and Makane. Somali constitutes the main language, some people speak Arabic. None of the groups qualify to be counted under ESS 7 'Indigenous People / Sub-Saharan African underserved Traditional Local Communities'. All groups speak Somali as indigenous language, and other than distinctions based on kinship (in the case of Beledweyne sub clans of the Hawiye clan), there are no groups that separate themselves on the basis of socio-cultural identities or features.

The city of Beledweyne enjoys a privileged location that makes it an important commercial hub for livestock and agricultural production. However, the rapid growth of the city, the big influx of IDPs and the high risk of flooding make urban planning more necessary than ever. Although there may not be urban planning laws in place, it is possible to move towards sustainable development with good coordination among the actors active in the district, and following some basic town planning principles. If no particular urban planning effort is undertaken, current unsustainable development trends can be expected to continue and urban problems, especially those related to the management of the Shabelle River, will rapidly intensify.

The city has also grown due to large IDP influx. The west side of the city hosts a large IDP settlement, called 'ex Airport' and some smaller IDP sites in Howldlag village. IDPs constitute the key vulnerable groups in the city. Further vulnerable groups include women and girls as well as elderly people.

Beledweyne is located at a major trade gateway, connecting the north and the south of the country. It is also key for the country's agricultural and livestock production. It serves the markets in the region, including international exports through Berbera and Bossaso seaports. Small scale farmers cultivate maize, soybeans, groundnuts, sesame and sunflower. Large scale farmers grow vegetables and fruits, including mango, watermelon, papayas and more. Livestock markets in town bring together livestock traders from the whole region.[10]

3.10 Administration and Governance

The current Hirshabelle State is the youngest state in Somalia. The Beledweyne District Administration is led by a mayor, who was appointed by the Hirshabelle State. She is the first female mayor in Somalia. Beledweyne also has a district council. According to the Fragility Index Maturity Model (FIMM) respondents, the council is representative of local sub-clans. District authorities at times struggle to maintain security and law and order in the town[11]. Local revenue is generated through taxes and registration fees for businesses and NGOs. A Council of Elders

[10] AMISOM, Belet Weyne, Sector IV Profile, accessed at: https://amisom-au.org/wp-content/uploads/2013/11/Sector-IV-Belet-Weyne.pdf

[11] Fragility Index Maturity Model (FIMM), Round 3 - March 2019

exists in Jowhar and is relatively influential, particularly on matters concerning clan conflicts and resource disputes. The council reportedly works with the local government to help with local stability and peace processes. The full council consists of 40 members from a wide range of sub-clans[12].

The local power and administrative structures can be used in case any conflicts or any land and resettlement questions arise (as per Resettlement Policy Framework). Additionally, during the rehabilitation of the proposed Far Libaax Road, the District Commissioner will be involved in the whole process because the District Commissioner Office has direct responsibility to maintain the road.

The District Commissioner Office is also responsible for providing security for the project personnel working in road assessments and designs, and for the contractors engaged in the rehabilitation works implementation.

3.11 Social Services

Somalia's human development indicators remain extremely low and continue to aggravate the humanitarian situation. Coverage and quality of basic social services in the country is low, mainly due to a lack of infrastructure. Road rehabilitation will help connect some of the existing service infrastructure.

Beledweyne Town hosts 23 formal schools, 15 of which offer both primary and secondary education levels, while the rest is for primary education only. The largest of these include Horseed, Abdisomane, Mujamac and Al-Aqsa. Fees for primary school start at $10, with secondary costing approximately $15. Schools often are understaffed, with teachers working for prolonged periods without regular pay. In addition, there are 7 universities offering higher education to the community, namely Beledweyn, Central, Green Hope, Hiran, Jobkey, Plasma and Somavilla Universities. These universities offer different programs, such as business administration, IT, public administration, medicine and agriculture. They charge on average $ 35 per semester.

Somali's Beledweyne General Hospital provides most of the medical cover for the district, but it lacks sufficient medical equipment and supplies. The hospital is supplemented by clinics run by NGOs. Private clinics are available to those who can afford them, with fees starting at $50 for consultations. All four subdivisions of Beledweyne District have at least one medical health care facility and they are supported by NGOs[13].

BECO and Haji provide electricity. Internet services can be accessed 75% of the time. Public areas are well lit at night. Mobile phone coverage is provided by Tecno, Itel, Global, Hormuud and Somtel.

[12] DTTO

[13] Beledweyne Action Plan, 2019

There are many religious buildings, such as mosques and Koranic school centres, but there is no official data regarding the exact number. The district has one main football stadium that is located in Haawo Taako village. It is called Laqanyo Stadium and was built in 2015. There are also markets and police stations placed in strategic locations, as indicated on the map above.

4. Project Description

The medium-term flood recovery component, under the SCRP supports the rehabilitation of public and community infrastructure in line with "build-back-better" and climate-resilient standards. This component involves the rehabilitation of water and sanitation systems, broken or non-functioning pre-existing flood control systems (e.g., embankments, drainage, irrigation canals and restoration of river channels through dredging), health facilities, bridges, and small feeder roads.

4.1 Project Selection

Far Libaax Road meets criteria set out for C2 projects in the Project Appraisal Document (PAD) as explained below:

- The road is damaged by local drainage flooding and impassable during the rainy seasons. The flooding is because the road is not engineered and lacks drainage infrastructure to keep it motorable in wet seasons.
- The inclusion of Far Libaax Road under C2 support has been requested by the State and the local administrations and supported during the local community consultation process
- Far Libaax road connects the rural farming areas to the markets / livelihood support, an objective of C2
- Solution to the perennial flooding problem can be resolved by incorporating Build-back better principles i.e. providing appropriate drainage facilities to ensure sustainability
- There are no identified security issues and the section of the road proposed for rehabilitation is accessible for the rehabilitation works implantation
- Based on the initial environmental and social screening undertaken, no major challenges are anticipated in ensuring environmental and social compliance
- The estimated cost of the rehabilitation works is within the available budget for C2 works in Hirshabelle State

Far Libaax road was found to be not flood-affected by flooding from the Shabelle river but by surface runoff from the catchment area associated with the road. The riding surface consists of a layer of un-compacted and ungraded rocky gravel. The alignment, both vertical and horizontal, is not engineered. The total lack of drainage infrastructure – side drains, culverts etc on the road exacerbates damage caused by surface runoff. The road users are motor vehicles, motorcycles, bicycles, donkeys, and pedestrians.

Figure A section of Far Libaax road proposed for rehabilitation

4.2 Proposed Intervention

The proposed intervention will improve the road profile, road pavement and the surfacing, and the drainage provisions. The semi-urban part of the road will be paved to bitumen standards while the remaining section extending to the rural area will be rehabilitated, but with gravel surfacing, as agreed with the client.

The proposed rehabilitation will scarify the existing road up to 150mm and compact it to form the subgrade. This will be followed by a gravel subbase layer, improved gravel base layer, and asphaltic concrete surfacing for the semi-urban section. On the remaining 1.2 km, a 300mm layer of base quality gravel (laid in two layers) will be laid on the subgrade and will also form the surfacing.

There are no major drainage channels – rivers, streams, and therefore no major drainage structures involved. Cross pipe culverts are proposed at low lying points. Trapezoidal lined side drains with cover slabs for pedestrians are proposed through the semi-urban area, while open earth side drains (or slopes) will be provided through the rural section as part of rehabilitation works.

The geometrical elements of the road will remain the same except for improvements to the vertical alignment to improve visibility.

4.3 Project Activities

Design Phase: The design phase included the following activities:

- Road condition assessment - A team comprising a Road Engineer and support staff conducted an assessment mission on identified roads and infrastructure in Beledweyne.

The team visited Beledweyne in April 2021 and assessed roads and infrastructure. This was a follow-up assessment after the initial reconnaissance assessment made by the advance team in March 2021.

- Consultation - The stakeholder consultation involving both the State and local authorities and the local communities were conducted, by PIU and UNOPS staff.
- Surveying - collection of topographic data and developing a digital terrain model for design.
- Geotechnical Investigations - identification of material sites, carrying out in situ material tests as well as collection of soil and construction materials samples for laboratory testing.
- Road Design - In complying with the design standards, the geometric design has been carried out to improve the existing horizontal and vertical geometry while at the same time ensure that drainage of surface run-off is catered for. Road user safety and comfort has also been taken into consideration within the extent of the existing road alignment. The designed alignment follows the existing alignment The road section within the semi-urban areas on Far Libaax Road from chainage 0+000 - 0+800 has been designed to bituminous standard with asphalt concrete surfacing. A gravel surfaced section was designed from chainage 0+800 - 2+000. The designed pavement sections are shown below.

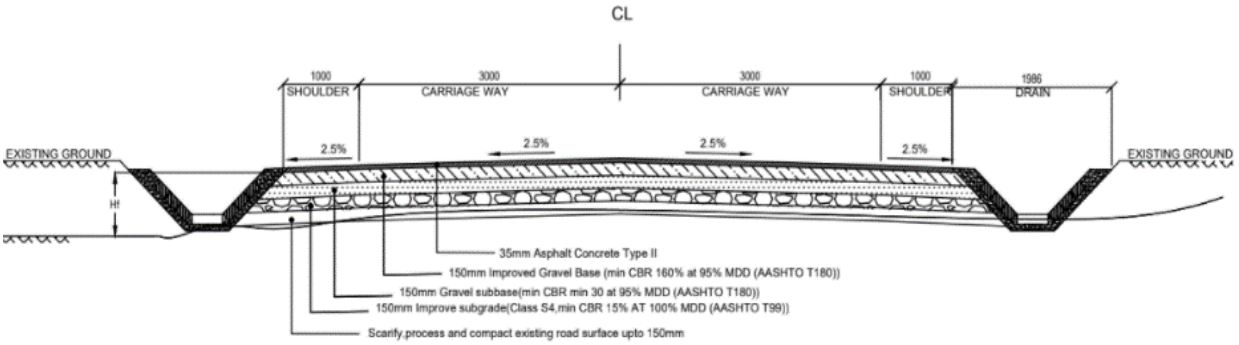

Figure 11 Asphalt concrete pavement

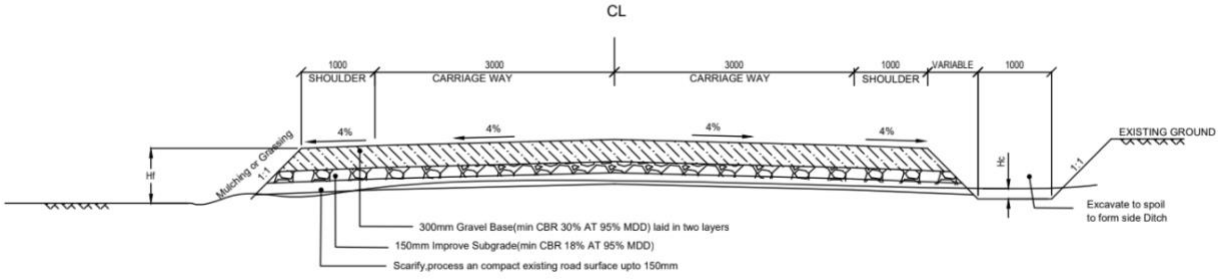

Figure 12 Typical design cross sections of Far Libaax Road

- Design of drainage structures - The designed side drains of the roads are trapezoidal in shape with side slopes of 1H:1V. Hydrological analysis was performed on all the side ditches. The side ditches were designed to sufficiently channel run-off flows based on a 5-year return period. Two piped culverts (2 x 900mm dia. & 2 x 600mm dia.) have been designed to discharge the drainage water to the opposite side of the road, and then to the natural depressions. The culvert design main information is shown below.

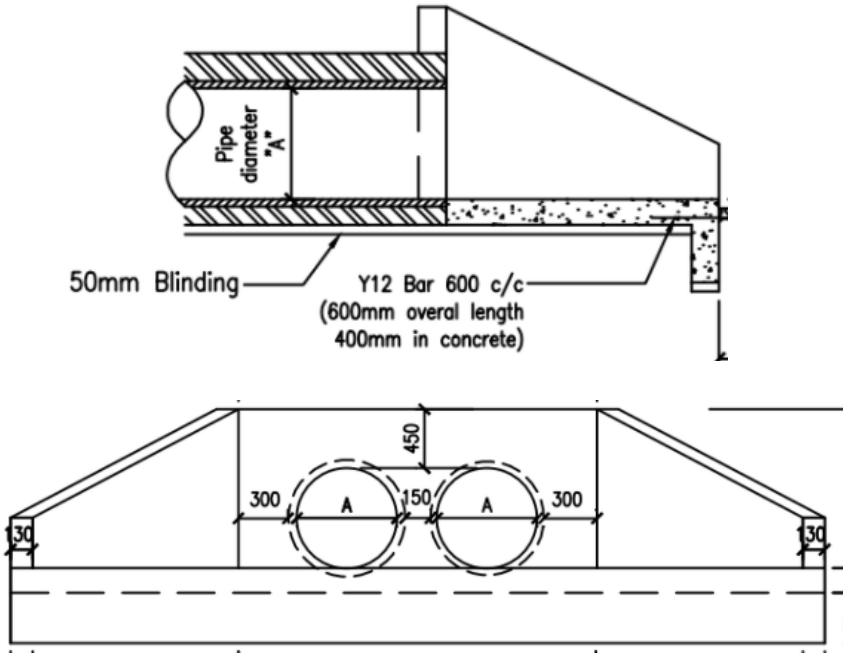

Figure 13 Longitudinal and Cross sections of a typical culvert

Construction Phase: The construction of 2 km road of 6m wide carriageway, 1m shoulder and side drains will include the following construction activities:

- Identification and construction of diversions and allowing for passage of traffic during works implementation.
- Identification of material borrow sites for natural materials including gravel and aggregates and seeking requisite approvals.
- Identification of spoil areas for management of natural materials that are not suitable for incorporation into the works.
- Site clearance and topsoil stripping which consists of removing any vegetation within the construction width and organic matter in the top 150mm layer of soil. These activities are expected to be minimal since the design follows the existing alignment.
- Earthworks (approx. 10,650 m 3) which include all activities undertaken to form the road foundation such as excavation, filling and compaction and construction of subgrade layers.
- Construction of Asphalt Concrete Surfacing (35mm) - from Km 0+000 to Km 0+800

- Construction of Cement and/or lime improved Base Course (150mm)
- Construction of Gravel Subbase (150 mm), from Km 0+800 to Km 2+100
- Construction of Gravel Wearing Course (150mm)
- Construction of Gravel Base Course (150mm)
- Pipe culverts (approx. 280m)
- Road furniture inclusive of road signs, road marking works (for the paved section), and installation of speed humps
- Creating awareness on solid waste management on site and consultations with the local authority on the disposal of the same at designated or licensed site

Operation Phase: The operational phase activities will include:

- Creating awareness on road safety to ensure reduced or no cases of accidents on the roads and ensuring proper road usage by both the drivers and the community.
- Road inspection and maintenance to increase longevity. Drainage inspection and maintenance to reduce or avoid flooding incidences.
- Maintenance of trees and any vegetation planted during the construction phase.
- Maintenance of road signs.

5. Environmental and Social Risks and Impacts

This section lists the anticipated positive and adverse impacts associated with the Far Libaax Road rehabilitation project.

5.1 Positive Impacts

- The rehabilitation of Far Libaax Road as per the new design with provisions for drainage improvements will remedy damages done by drainage flooding and will contribute to a sustainable road infrastructure.
- The rehabilitated road will provide an important transport route connecting urban and rural areas, with improved accessibility to health, education, other services and for livelihood opportunities in the town for the rural populations.
- The road with properly designed and constructed side drains and culverts will guide the storm water flows and control soil erosion.
- Improved road surface would result in fuel efficiency and vehicle maintenance costs savings.
- Travel time savings to contribute to productive activities.

5.2 Negative Risks and Impacts

The activities associated with the rehabilitation of Far Libaax Road will likely generate adverse site-specific risks and impacts, such as:

Construction Phase

- Management and disposal of material generated from construction activities during the construction phase,
- Increased level of dust, noise and vibration from moving of construction vehicles and machinery,
- Increased level of air pollution through operation of heavy equipment and vehicles for construction,
- Generation of construction waste,
- Sourcing of materials, an activity which may degrade the surrounding environment,
- Security for project operations including the protection of project workers and beneficiaries,
- Labor influx and associated risks such as GBV/SEAH, specifically for women.
- Risks associated with labor rights and management, e.g., child labor or forced labor, specifically for children.
- Occupational health and safety of workers both during the construction and operational phases, specifically for workers recruited from the community.
- Challenges in access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring, specifically for vulnerable groups (such as women, minority clan members etc..)
- Traffic risks during construction,
- Limitations in effective community engagements and participation,
- Security for project operations including the protection of project-affected persons,

- Community health and safety risk: traffic safety, water and sanitation safety, life and fire safety, protection from COVID-19.

Operational Phase:

- Increased level of noise from increase in traffic
- Road traffic safety risks
- Soil erosion

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

In regards to Far Libaax Road, there are no land and resettlement impacts, nor temporary or long-term economic impacts.

6. Environmental and Social Mitigation Measures and Monitoring Plan

The table below lays out the specific adverse risks and impacts anticipated for the project, lays out the respective mitigation measures required to reduce or eliminate the projected project impacts. This matrix forms the core of the ESMP, since it shows exactly what must be done and by whom. See Annex 3 for an E&S Monitoring template.

Table 3 Environmental & Social Management Plan: Rehabilitation of Far Libaax Road

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

		● PIU to prepare local Security Management plan (SMP) ● Contractor to prepare local Activity Security Plan ● Implementation of SMP and local Activity Security Plan			Local Security Management Plan Local Activity Security Plan Mitigation measures of local Activity Plan implemented	
	Risk of labor and working conditions of all the workers don't comply with WB and Somali legislation – including OHS risks.	● Implement and monitor the LMP ● Listing of all staff and titles, new hires and departure ● Site visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector or auditor name	Contractor	Incl in contractor staff costs	Register provided Log book showing site visited and actions taken	monthly
	Risk of labor influx leads to increase of GBV cases	● All workers to sign CoCs before commencement of their assignment (see annex 4) ● Dedicated reporting channel for victims through Project GRM	Contractor	Incl in contractor staff costs	Signed COCs	At start of project
	Risk of discrimination against women in employment	● Contractor to develop recruitment and retention policies that enable fair working conditions and	Contractor	Incl in staff costs	Recruitment and retention policies Signed COCs	At start of project

		women's safe and equitable participation. ● All workers to sign CoCs before commencement of their assignment.				
	Risk of delayed payment or underpayment of workers, leading to complaints and conflict	● Ensure provision of timely payment ● Ensure provision of workers' GRM	Contractor	Incl in contractor staff costs	Records indicating that payments made on time Existence of Workers' GRM	Monthly
	Risks of child and forced labor resulting in employing of underage children and human trafficking	● Set-up of a workers' GRM to ensure their voices / complaints are heard ● Contractor to maintain staff records, ID copies, and perform spot checks against child and forced labor.	Contractor	Incl in contractor staff costs	Existence of Workers' GRM List of names of workers and their gender and age made available for review	At start of the project
	Risk of spreading COVID 19 at work place	● Contractor to ensure workers have access to face masks and sanitizers. ● Regular sensitization on COVID 19 to ensure workers observe the social distancing especially when in the community and public places	Contractor	Incl in contractor staff costs	Face masks and sanitizer available Sensitization session	Prior to activity commencement and throughout activity
	Risk of workers being unaware of the dangers at the site (quarries, construction site etc…) leading to injury	● Regular review and provision of PPE to the project sites ● Workers' GRM in place ● Regular fire drills	Contractor		Evidence of regular reviews conducted Workers' GRM in place	Monthly

					Evidence of fire drill conducted	
	Risk of traffic and road safety for Project workers	• Include traffic and road safety into the daily toolbox talks. • Emphasize safety aspects among drivers • Improve driving skills of drivers • Requiring licensing of drivers • Adopt limits for trip duration • Arrange driver rosters to avoid overtiredness • Avoiding dangerous routes and times of day to reduce the risk of accidents • Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction.	Contractor		Evidence of road traffic safety inclusion in daily toolbox talks All drivers can produce correct license Register of vehicle maintenance	monthly
ESS 3: Resource Efficiency and Pollution Prevention and Management						
ESS 3	**Construction Phase**					
	Impacts of generation of solid waste	• Ensure disposal of generated solid waste at designated and authorized disposal site consistence with the local and international	Contractor	waste management costs 10,000 USD lump sum per site	Records of amount of solid waste disposed, where and when Records of Project GRM and	monthly

		requirements (see WBG General EHS Guidelines)[14] ● Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal by the contractor – Project GRM ● Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, cultivation fields, irrigation channels, natural drainage paths, wetlands and critical habitat, the existing waste management system in the area, local routes, and general aesthetic value of the area			addressed grievances Records of amount of solid waste disposed, where and when	
	Risk of poor sanitation facilities and sanitation conditions condition at work site	● Provide proper water closet toilet facilities at all long term (> 1 month) work sites. ● Do not allow water to run out at toilets.	Contractor	5,000 USD	# of water closet toilet facilities available % of toilets leaking	monthly

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

		● Maintain all toilets in clean and sanitary condition. ● Provide proper earth pit latrines at all work sites where work will be undertaken for periods of up to one month. ● Fill the latrines in once they become full and when site work is complete. ● Do not allow site workers to defecate in the open anywhere on the site or in its vicinity. ● Add the use of sanitation arrangements in toolbox talks			Toilets are well maintained # of latrines provided % of latrines filled # of workers openly defecating Sanitary arrangements part of toolbox talk	
	Risk of pollution from construction wastes and water use	● Through accurate estimation of the sizes and quantities of materials required, order materials in the sizes and quantities they will be needed, rather than cutting them to size, or having large quantities of residual materials. ● Ensure that construction materials left over at the end of construction will be	Contractor	Incl in contractor staff costs	No construction materials left over at the end All waste at construction site is disposed of appropriately Waste bins are available at construction sites	Commencement of project

		used in other projects rather than being disposed of. ● Ensure that damaged or wasted construction materials will be recovered for refurbishing and use in other projects ● Donate recyclable/reusable or residual materials to local community groups, institutions and individual local s or home owners. ● Dispose waste more responsibly by dumping at designated dumping sites or landfills only. ● Waste collection bins to be provided at designated points on site				
	New Material sites and borrow pits	● Once material sites and borrow pits are identified and selected, the process followed to activate it should fulfill all applicable ESF requirements in terms of specific environmental assessments and where necessary	PIU/Contractor	5000USD	Adequate E&S plan that includes rehabilitation for management of new quarries and borrow pits in place	Before activity commencement

		update ESMP or add in C ESMP. ● Upon works completion rehabilitate borrow pits and quarries; ● Only licensed borrow pits will be selected				
Operational Phase						
	Risk of soil erosion	● Mulching to stabilize exposed areas ● (re)-vegetation of soil areas	Contractor	3000 USD	Soil areas have been vegetated	After finalization of construction
ESS 4: Community Health and Safety						
	Construction Phase					
ESS 4	Risk of increased GBV/SEAH cases and risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors by project workers	● Implementation and monitoring of GBV / SEA Action Plan ● GBV awareness sessions for community ● GBV awareness sessions for workers. Engage a dedicated specialist to support oversight and management of these risks ● Workers to sign COC	PIU	Incl in PIU staff and travel costs	Activities under GBV/SEA Action Plan implemented # of GBV awareness sessions # of sessions # of specialists engagement % of workers that have signed CoC	monthly
	Risk of spread of communicable diseases (SIIs , HIV/AIDS, COVID-19 etc..) between workers and the community	● Community awareness sessions on communicable diseases	PIU	Incl in PIU staff and travel costs	# of community sensitization	monthly

		● Implement COVID-19 protection measures			% of workers that have signed CoC % or works with access to face masks and sanitizer	
	Risk of exposure of community members to physical hazards on project sites.	● Undertake safety precautions to address safety hazards for the nearby community, ● Sensitize the local community on the activity of type project and inform them about construction risks and the restricted access to the site ● Restrict access to construction site through signage ● Remove hazardous conditions on construction sites that cannot be controlled effectively with site access restrictions, such as covering openings to small confined spaces, ensuring means of escape for larger openings ● Locked storage of hazardous materials	Contractor	Inc in Contractor budget	# of sensitization measures for communities Signage available around construction site All small openings are covered Larger openings have an escape opening Locked storage for hazardous materials is available	At commencement of activity

	Risk of traffic and road safety	● Safety/warning signage, safety barrier around the construction site, and safe driving practices () ● Include traffic road safety into the daily toolbox talks ● Emphasize safety aspects among drivers ● Require licensing of drivers ● Adopt limits for trip durations and arrange driver rosters to avoid overtiredness ● Avoid dangerous routes and times of day to reduce risk of accidents ● Regular maintenance of vehicles to minimize potential for accidents.	Contractor	Inc in Contractor budget	Signage available Toolbox talks include road safety issues 100% of drivers are properly licensed Driver roster available Maintenance log for vehicles is available	monthly
	Impacts of dust, air pollution and noise generation	● High level maintenance of the vehicles to reduce the vibrations ● Selecting equipment with lower sound power levels ● Installing suitable mufflers on engine exhausts and compressor components ● equipment casing	Contractor	Inc in Contractor budget	% of vehicles well maintained % of engine exhausts with mufflers installed % of activities implemented during the days	At commencement of activity

		● Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance. ● Suitable wet suppression techniques need to be utilized in all exposed areas ● All unnecessary traffic must be strictly limited on site speed controls are to be enforced ● Ensure that the site is located away from pollution sources				
Operational Phase						
	Increased level of noise from increase in traffic	● Install signage for speed control in front of settlements	Local Authorities	Municipal budget	Speed control signage has been introduced	One time upon project completion
	Road traffic safety risks	● Install signage for speed control in front of settlements ● Safety/warning signage, safety barrier, and safe driving practices	Local Authorities	Municipal budget	Speed control signage has been introduced Safety/warning signs have been installed	One time upon project completion
ESS 10: Stakeholder Engagement and Information Disclosure						
	Preparation Phase					

ESS 10	Risks of poor access to beneficiaries lead to less meaningful community engagements and difficulty in monitoring for social harm	● Implementation of GRM ● Monitoring of GRM solutions in a timely manner ● Use site-specific incident logs	PIU	PIU GRM costs	% of complaints filed have been addressed Site-specific incident log available	monthly
	Risks of lack of information on access to GRM leads to lack of accountability	• Awareness raising on GRM	PIU	PIU budget for GRM	# of awareness sessions of GRM	quarterly
	Lack of information disclosure leads to lack of transparency and suspicions of mismanagement of the sub project	• Conduct in- depth community engagement, providing information on the sub project • Implement SEP	PIU	PIU budget for stakeholder engagement	# of community engagement sessions held	quarterly

7.Institutional Arrangements and Responsibilities

7.1 Government Institutions

The work implementation will be managed by the Project Implementation Unit (PIU) embedded within the SCRP institutional structures. The PIU will be contracting a construction company directly to implement construction works. The construction company will implement the project including all Environmental and Social (E&S) mitigation measures defined in this ESMP.

Below is the list of Government institutions involved in the road rehabilitation works implementation, with their respective roles and interests.

Table 4 Institutional partners' responsibilities

Project Implementation Unit - PIU	The application of mitigation measures required under this ESMP is the sole responsibility of the PIU. However, since actual construction works will be carried out by the private entity, the PIU will ensure that implementation of the ESMP is incorporated in the Request for Proposals (RfPs) and the costs are integrated in the Bill of Quantities (BoQs), and subsequently in the legal agreement between the construction company and the PIU. The agreement will also include the requirement for the contractor to develop a C-ESMP, which includes a health and safety plan, in accordance with this ESMP. The C- ESMP will be reviewed and approved by the PIU Environmental and Social Safeguards Specialists. The PIU is responsible to instruct, observe and monitor its contractors against the ESMP provisions. The PIU should make sure that corrective actions are applied by the contractors, when necessary. The PIU can also undertake the monitoring itself if deemed necessary. The PIU will request for any violations to be corrected by the Constructor and monitor the actions and undertakings in correcting violations.
State Project Team - SPT	The SPT's Environmental & Social Safeguards Specialist will monitor the implementation of risk mitigation measures by the construction company. The monitoring will be supported by the PIU / SPT Engineers and the Community Consultation Specialist. Environmental and social monitoring reports will be prepared by the SPT and submitted to the PIU every month throughout the project duration.
Ministry of Public Works (MoPW)	MoPW - the responsible State Ministry on all infrastructure development and maintenance has been engaged in the design development consultation and the certification process. The MoPW's technical staff will be engaged in the supervision of the work implementation by the Contractor.
District	The District Commissioner (Municipality) representing the local

Commissioner	community and the interest will be engaged in the day to day coordination of the work implementation by the Contractor. The District Commissioner will be specifically involved in facilitating stakeholder engagements, assisting the Contractor in the recruitment of local workers and ensuring the security to the Contract staff and the supervision teams. The District Commissioner will be the first point of contact for the local communities for raising construction activities related inquiries.
UNOPS	UNOPS Engineers and Safeguard team will be available to provide advisory level support to the PIU during the works implementation on technical and safeguard compliance related matters.

7.2 Contractor

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

- Ensure that all operations comply with the environmental and social standards laid out in this ESMP and in the Project's ESMF.
- Ensure that the control measures provided for in the ESMP are both understood and implemented by site personnel.
- Comply with accident and incident reporting as laid out in the ESMF. All severe incidents must be reported to the PIU within 48 hours of occurrence, including in the event of chance finds.
- Comply with chance find procedures (see Annex 5)
- Set up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies.
- Ensure compliance with all mitigation measures in this ESMP.
- Monitor the ESMP implementation, against the monitoring indicators laid out in the ESMP Table.
- Participate in Community Consultative Meetings.
- Identify additional significant matters pertaining to environmental and social compliance.
- Liaise with the SPT/PIU Environmental and Social Safeguards Specialists on the need for corrective action in the event of unexpected environmental or social problems emerging during the course of operations.
- Communicate with all of the contractor's staff regarding environmental and social compliance requirements and other matters of importance.
- Identify additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Prepare of reports on all aspects of environmental and social compliance.
- Maintain lists of all workers, including their age and gender.

- Maintain a workers' grievance mechanism.
- Prepare and maintain an OHS Plan.
- Provide training to all workers on OHS Plan.
- Ensure signing of CoC by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.

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

E&S Safeguards or Environmental Health and Safety (EHS) Specialist: The contractor will deploy an E&S or EHS Specialist as an addition to the team to ensure operationalization of this ESMP, including monitoring, supervision and reporting on mitigation measures. The key tasks of the Specialist include:

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

8. Reporting on ESMP Compliance

The PIU will prepare periodic monitoring reports, including inputs from the Contractor and the SPT, on the status of implementation of ESMP. The reports will be submitted to the World Bank for their review and feedback as part of the PIU's general Quarterly report to the Bank. Details of these reports and their content are given in Table 6 below. A template for an Environmental and Social Monitoring report is included in Annex 3.

Table ESMP Monitoring and Compliance Report

#	Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
1	ESHS Monitoring Report to PIU	Compliance status of the Project with the environmental and social mitigation and monitoring measures. The report should cover: ● environmental incidents ● health and safety incidents, ● health and safety supervision: ● Usage of PPEs by workers ● worker accommodations for foreign workers; ● highlights of inspection ● Training conducted and workers participated ● Workers grievances ● Community grievances ● Chance find (if any)	Monthly	Contractor/SPT
2	ESMP Monitoring Report to WB	Compliance status of overall Project with ESMP requirements	Quarterly	PIU

3	Incident Reports	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to address the future recurrence of this event	Initial investigation report for severe incidents within 24 hours. Detailed Investigation Report within ten days	PIU (contractor/SPT to PIU_

9. Capacity Building and Training

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

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

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

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

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

9. Stakeholder Consultations

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

Initially, the PIU and UNOPS teams traveled to Hirshabelle State on 3 March 2021, for a joint assessment mission to identify flood-affected infrastructures through broad consultations of local authorities and communities. The team visited Beledweyne town. At this point, the specific site was not yet decided on and the objective was to identify the key needs of the local communities and to allow for the prioritization of specific flood-affected infrastructure. During this field assessment mission, district and community level consultations were held in Hirshabelle, including in Beledweyne town. Key topics covered during the consultations included the provision of all sub-project related information to affected communities, ensuring coordination between the SCRP and local authorities and community structures, receive feedback and comments on the identification of projects, receive feedback and comments on the potential environmental and social risks of the identified projects and planned mitigation measures, and discuss investment sustainability, as well as familiarize communities with the Project GRM. In addition, after the consultations, the SCRP provided project information through its website, flyers directly distributed in communities, and radio shows. The list of attendees is included as Annex 1 of this document. The consultations consisted of separate sessions with different types of stakeholders, including local authorities (the Governor of Hiran Region Mr. Ali Jeyte, the Beledweyn District Commissioner Mr. Ali Kediye, the Mayor of Hiran , Ms. Nadar Tabaax, Security Chiefs, Flood Protection Committee members, officials from various Ministries), youth and women's representatives, community elders, business people and religious leaders.

During the sessions with the district administration, it was stated that Beledweyne is the most flood affected city/district in Somalia and significant amounts of its infrastructure - including roads, hospitals, houses and schools - were destroyed by recurrent floods, caused by the over-flowing of the river. Participants in the meeting articulated their immediate priority needs as follows:

1. Flood Risk Management
2. Rehabilitation of roads
3. Rehabilitation and construction of health facilities
4. Rehabilitation of the water infrastructure

Sessions with community members: The team met with elders of the local flood-affected communities, who informed the team that Beledweyne is a city destroyed by recurrent floods and has been affected by recurrent floods for many years. They stated that NGOs operating in the area do not play their role efficiently and are incapable of addressing these recurrent floods and effects.

Session with representatives of the agro-pastoralist communities: Participants said that every time floods occur, their farms and crops are destroyed, which affects livelihoods of many in Beledweyne. They also stated that the farming equipment is affected by the floods and the roads

that lead from and to the farms and to the city – which are crucial to transport crops and vegetables to the city in order to be able to sell the produce - become severely flooded. Apart from rehabilitation of specific road infrastructure, they identified two HCF as priorities for rehabilitation and/or construction of new facility depending on the status of the infrastructure and the environment.

Session with representatives of the youth community in Beledweyne. Youth representatives stated that recurrent floods in Beledweyne have caused their employment to be halted, which has affected their and their family's livelihoods severely. They told the teams that whenever severe flooding occurs they are displaced from their villages and neighborhoods until the water eventually dries up, which can take up to 3 months. The youth representatives requested that canals be built around the river to help the stream of water and the creation of cash-for-work for the youth when construction takes place.

Session with representatives of the IDP communities: The most vulnerable members of Beledweyne are the IDPs, who mostly have fled from local level conflicts and from Al-Shabaab, and have been seeking safe haven in Beledweyne. Some of them have been displaced again due to the flooding events and their shelters have been destroyed. Representatives of the IDP community, the most vulnerable communities in Beledweyne stated that there was no assistance in Beledweyne and when they are displaced, there is no access to health care – however insufficient it may be. The same groups also stated that wells have been affected by floods and outbreaks have happened, previously such as cholera which devastates vulnerable communities who don't have access to sufficient medical care.

Once the rehabilitation of Far Libax Road was decided on, follow-on site visits and stakeholder engagements were undertaken. Below is a summary of the stakeholder consultations carried out during the design development and approval process.

Table Stakeholder consultation records

Date	**Type of Consultation**	**Stakeholders Consulted**	**Issues discussed**
2 - 6 March 2021	Stakeholder consultation and initial assessment visit to Far Libaax Road	State MoPIED, State MoPW, Governor of Hiran Region Mr. Ali Jeyte, the Beledweyne District Commissioner Mr. Ali Kediye, the Mayor of Hiran Ms. Nadar Tabaax, Security Chiefs, Flood Protection Committee members, officials from various Ministries, youth and women's representatives, community	Flood risk to the community Prioritization of infrastructure for rehabilitation works Security assessment and accessibility Beneficiaries' community - potential impact of

Date	Type of Consultation	Stakeholders Consulted	Issues discussed
		elders, business people and religious leaders	reconstruction of the health facility
10 - 14 April 2021	Technical Assessment of Far Libaax Road by UNOPS Road Engineer	Regional administration, Beledweyn Municipality /commissionaires, Community	1- road damage assessment 2- priority areas. 3- level of road accessibility. 4 context and environmental and safeguard issues. 5- Social impacts and priorities.
27th - April - 3 May 2021	Geotechnical and topographical data collection of Far Libaax Road by UNOPS Material Engineer & Surveyors	1- MoP - Hirshabelle State 2- Regional administration 3- Beledweyn Municipality / commissionaires.	Purpose of the Geotechnical and topographical data collection and the schedule
1st - 8 May 2021	UNOPS Drainage Engineer assessment field visit to Far Libaax Road	Hiraan Regional Administration/Governor Office, Local Municipality/ Beledweyn Mayor	Assessment of drainage system to incorporate to the design.
26 December 2021	Client Review: Technical Review of the Detailed Design Review (via email)	Hirshabelle State (Ministry of Public Works) Engineers / Ministry of Planning, Federal PIU Engineer	Detailed designs were reviewed and approved by the MoPW.
On-going	C2 COP meetings	PIU, World Bank & UNOPS - technical meetings	Planning, consultation, design standards, implementation scheduling etc.
In progress	World bank technical review of the road designs	World Bank Technical Lead	Pending

During this field assessment mission, district and community level consultations were held in Beledweyne. Consultation shared sub-project related information, plans for coordination between the SCRP and local authorities and community members, gathered input for the identification of projects, received comments on potential environmental and social risks of the identified projects and planned mitigation measures etc. The consultations undertaken supported the rehabilitation of damaged Far Libaax Road. See Annex 1 for further details.

Figure 14 District and Community leaders' consultation

10. Grievance Redress Mechanisms

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.[15] One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances'.[16] This Project GRM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SCRP provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the SCRP.

As per World Bank standards, the GRM operates in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines (see GBV/SEAH and Child Protection Prevention and Response Plan in the ESMF[17]). It also operates in addition to specific workers' grievance redress mechanisms, which are laid out in the LMP (also part of the ESMF).

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

The GRM Value Chain is presented in Annex 2.

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

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

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

11. Implementation Budget

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

Table 5 Implementation Budget

12. Conclusions

Far Libaax Road rehabilitation proposed under Component 2 of the Somalia Crisis Recovery Project (SCRP) connects the western rural areas to the urban centers and the proposed intervention is well supported by the Government stakeholders and the local communities. The rehabilitated road is expected to deliver significant benefits to the rural communities by providing improved access to the urban centers for social services, access to livelihood opportunities and economic gains. The improved roads would lead to savings in travel time and vehicle maintenance costs that could benefit the rural population. The primary beneficiaries are the rural populations of the western parts of Far Libaax town.

The activities associated with the rehabilitation of Far Libaax Road is also likely to generate site-specific risks and adverse impacts. Most of these are related to typical risks and impacts associated with thecivil works, for example, risks related to disposal and management of material generated from construction activities, occupational health and safety of workers both during the construction and operational phases, increased level of dust, noise and vibration from moving of construction vehicles and machinery, community health and safety risk, risks associated with labor engagements, e.g. child labor or forced labor, labor influx and associated risks such as GBV/SEAH, and others. Far Libaax has no land and resettlement issues or no issues of economic impact for roadside vendors, confirmed by the detailed engineering survey carried out as part of the road design.

The ESMP was prepared to help mitigate potential environmental and social risks and impacts. The risks and impacts for Far Libaax Road were classified as moderate, mostly consisting of typical civil works related risks and impacts. The ESMP will assist the PIU, SPT and the Contractor on environmental and social risk mitigation measures to be implemented throughout the works to ensure compliance with all SCRP E&S instruments, World Bank Environmental and Social Standards (ESSs) and local legislation.

References

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

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

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

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

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

The World Bank Group, Environmental, Health and Safety Guidelines

World Bank, Environmental and Social Framework, 2018

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

Annex 1: Community Consultations

Stakeholder Meeting Participants In Baladweyne, HIRSHABELE (March 3, 2021)

SR.NO	NAMES	DESIGNATION	MOBILE NUMBER
1	Nadar Tabaax Maalin	Mayor of beledweyn	0615551582
2	Ali Jeyle Osman	Governor	0612531079
3	Abukar Abdullahi	Deputy governor	0615081114
4	Osman Dhicisow	District commissioner	0615508028
5	Muhumad Ali	Deputy of district commissioner	0615724503
6	Abdirisaq Hussein Ali	Director	0615081522
7	Eng Abdirashid Ali Omar	Flood management committee	0612678254
8	Abdi Muhin Elmi	Regional Spokesman	0615897811
9	Igal Abdalle Elmi	Youth group	0615027980
10	Sharif Mohamed Fidow	Flood management committee	0615571689
11	Ifrah Ibrahim Hared	Women group	0615268315
12	Hanaan Omar Arte	Women group	061508049
13	Ismail Abdalle Adan	Deputy Director of the Lower House Land Department	0615757878
14	Mohamed Abdi Adan	Elders group	0618305119
15	Mohamed Fidow Adawe	Elders group	0615523944
16	Awil Mohamed Jibril	Ministry of Energy and Water Coordinator	0615859980
17	Eng. Khalid abdulnasir	Civil Engineer	0615764977
18	Adam Abdi Adam	Senior project coordinator	0615918230
19	Eng. Abdinasir Abdulahi Moahamed	Ministry of public works Engineer	0615859247
20	Eng. Abdulkadir Abukar Igal	Mistry of water and energy Water Engineer	615212806
21	Eng. Abdinur Farah	Ministry of finance Project Engineer	0617895176

Annex 2: Grievance Redress Mechanisms

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

GRM Objectives

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

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

Table 6 Types of Complaints expected

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

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

Available Channels

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

A help desk must be set up by the respective IP during the implementation of sub-project activities in an area.[18] They should be manned by the IP staff, especially its community project facilitators, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regards to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk.

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

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

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

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

Processing Steps

Step 1: Grievance Uptake

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

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

Step 2: Sort and Process

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

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

GBV/SEA/SH: All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

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

Step 3: Acknowledgement and Follow-Up

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

Step 4: Verify, Investigate and Act

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

Table 7 GRM Actions

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

Step 5: Monitor, Evaluate and Provide Feedback

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

- results of investigations;

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

Response Times

Table 8 GRM Response Times

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

Other Redressal options

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

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

Annex 3: Environmental and Social Monitoring Template

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

Table Environmental Monitoring Plan

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

Annex 4: Code of Conduct for Workers

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

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

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

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

Labor:

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

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

labor in all its forms.

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

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

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

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

Human Rights:

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

11. Harassment, Harsh or Inhumane Treatment: It is expected that contractors create and maintain an environment that treats all employees with dignity and respect. It is further expected

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

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

Environment:

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

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

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

16. Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

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

Ethical conduct:

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

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

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

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

Annex 5: Chance Find Procedures

This procedure was developed in accordance with the World Bank's ESS 8 (to protect cultural heritage from the impacts of project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, to promote meaningful consultation with stakeholders regarding cultural heritage. To promote the equitable sharing of benefits from the cultural heritage).

This procedure is included as a standard provision in the implementation of SCRP Public Works contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). All implementers / contractors will be required to observe this procedure as documented hereafter.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the PIU and the World Bank in order to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

- Stop construction activities;
- Delineate the discovered site area;
- Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the responsible authority takes over;
- Notify the responsible foreman/archaeologist, who in turn should notify the PIU and the World Bank and local authorities (within less than 24 hours);
- The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values;
- Decision on how to handle the finding will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage;
- Implementation of the decision concerning the management of the finding;
- Construction work can resume only when permission is given from the respective authorities, PIU and World Bank after the decision concerning the safeguard of the heritage is fully executed;
- In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archaeological findings works and protections.