DE-RISKING, INCLUSION AND VALUE ENHANCEMENT OF PASTORAL ECONOMIES IN THE HORN OF AFRICA PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

JULY 2022

ABBREVIATIONS

CBO	Community Based Organization
CoC	Code of Conduct
COMESA	Common Market for Eastern and Southern Africa
COVID-19	Corona Virus 2019
DRIVE	De-Risking Inclusion and Value Enhancement of Pastoral Economies Project
EA	Environment Assessment
EHS	Environmental Health and Safety
EMP	Environmental Management Plan
ESAP	Environmental and Social Action Plan
ESCP	Environment and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRMP	Environmental and Social Risk Management Plan
ESS	Environmental and Social Standard
FGS	Federal Government of Somalia
FMS	Federal Member State
FI	Financial Intermediary
GAP	Gender Action Plan
GBV/SEA/SH	Gender Based Violence/Sexual Exploitation and Abuse/Sexual Harassment
GHGs	Green House Gases
GIIP	Good International Industry Practice
GPMP	Guidelines for Pest Management Plan
GPN	Good Practice Note
GRC	Grievance Redress Committee
GRID	Green, Resilient and Inclusive Recovery
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HoA	Horn of Africa
IA	Implementing Agency
ICR	Implementation Completion Report
ICT	Information Communication Technology
IDPs	Internally Displaced Persons
ILO	International Labour Organization
ILRI	International Livestock Research Institute
IVA	Independent Verification Agency
LMP	Labour Management Procedures
M&E	Monitoring and evaluation
MoCI	Ministry of Commerce and Industry

MoF	Ministry of Finance
NGO	Non-Government Organization
OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PAPs	Project Affected Persons
PCM	Private Capital Mobilized
PCR	Physical Cultural Resources
PDO	Project Development Objective
PIU	Project Implementation Unit
PWD	People with Disabilities
SBS	Somalia Bureau of Standards
SCALE-UP	Somalia Capacity Advancement, Livelihoods and Entrepreneurship through Digital Uplift Project
SecMP	Security Management Plan
SEP	Stakeholder Engagement Plan
SQCC	Somaliland Quality Control Commission
TA	Technical Assistance
TLU	Tropical Livestock Unit
TNA	Training Needs Assessment
TPMA	Third Party Monitoring Agents
VSLA	Village Saving and Lending Associations
WB	World Bank
WHO	World Health Organization
ZEP-RE	PTA Reinsurance Company

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EXECUTIVE SUMMARY

Introduction and background

1. The Federal Government of Somalia (FGS) is preparing the De-Risking, Inclusion and Value Enhancement of Pastoral Economy in the Horn of Africa Project (DRIVE) to be financed by International Development Association IDA to the tune of US$70 Million. The DRIVE project will support the provision of financial de-risking in anticipation of drought (i.e., insurance and financial services) for the main asset of pastoralists, livestock, to allow them to invest in their herds. It will better connect pastoral production groups with markets, support trade infrastructure for cross-border and small-scale trade, and strengthen capacity to meet international standards. This will enable pastoral production groups to extract greater value addition from livestock-rearing activities. The project's development objective gives practical effect to the goal of increasing the value of agricultural and related products and promoting harmonization of standards and regulations that encourage the commercialization of markets for agricultural inputs and outputs. In addition, the project also contributes to the strategic objective of helping countries transition out of fragility toward stabilization. The overall project supports regional peace and stability through programs to improve livelihoods in border areas, promote cross-border trade, and strengthen economic interdependence. There is ample evidence that increased trade interactions increase the opportunity cost of conflict and enhance the resilience of vulnerable communities.

2. **The imperative of derisking:** Livestock trade represents one of the few economic success stories in the Horn of Africa (Little 2020). Annual exports from the Horn are estimated at close to US$ 1 billion. Around 50 to 60 percent of livestock from northern Somalia (including Somaliland) are informally sourced from Ethiopia and they often follow trade corridors based on clan relations. This informal cross-border trade is vital to the formal export business in Somalia, which exports more than four million live animals in some years. The project is timely and has come as a regional intervention to benefit from economies of scale, specialization, and to support trade, so that countries gain higher value than each acting alone. This regional approach is anchored on risk pooling, peace building and quality infrastructure and trade.

   Livestock sales are often influenced by ethnic and family ties, especially in Somalia. Pastoral producers are at the bottom of the market chains and because of grazing needs for their herds, are often distant from key market centers, where they could benefit from higher prices and be less vulnerable to opportunistic middlemen. Beyond problems of special access and high numbers of intermediaries, other reasons explain the limited value derived by producers selling live animals, including: (i) lack of quality infrastructure to trace livestock and ensure standards; (ii) limited resources for disease control; (iii) transport systems (trucking or trekking) which stress animals and lowers their weights and thus prices; (iv) poorly timed sales due to lack of feed and food during drought means selling livestock when prices are lowest, rather than selling when rains and livestock prices are good; and (v) lack of public livestock price information resulting in an asymmetry of information between traders and producers.

   De-Risking, Inclusion and Value Enhancement of Pastoral Economies in the Horn of Africa Project: the proposed regional project to be funded by the World Bank is intended to protect the pastoralists against drought with enhanced access to financial services and upgrade the livestock value chain with better quality infrastructure. These two major interventions will increase the uptake of investment and insurance which will have pastoralists sustain core breeding stock and help them move up the value chain. The project will target a sub-set of pastoralists, those who are organized in productive groups and are willing to engage in commercial activities. Organized pastoralist groups with regular livestock sales and protection against drought will be more attractive to credit institutions, and access to credit will enhance productivity by enabling pastoralists to invest in livestock related businesses. In the long run the project will complement on-going interventions on physical and social resilience, benefit from economies of scale, specialization, and to support trade, so that countries gain higher value than each acting.

3. **Project Objectives:** The project development objectives are to enhance pastoralists' access to financial services for drought risk mitigation, include them in the value chains, and facilitate the livestock trade in the Horn of Africa. **PDO level indicators:** The expected results indicators for the project are as follows: **a)** Average time for traders to cross at targeted border crossings (in minutes, disaggregated by gender) **b)** Quality of public services–degree of satisfaction with border management services (percentage, disaggregated by gender) **c)** Value of trade through targeted trade infrastructure (amount in USD) **d)** Change in value of final products traded by beneficiary traders' associations in regional markets (percentage, disaggregated by gender). The project will have two components:

Component 1: Package of financial services for climate resilience: This will support the provision of an integrated package of financial services to build the climate resilience of pastoralists. Currently, due to the vulnerability of pastoralists to shocks and limited financial awareness, the number of pastoralists engaging with formal financial services is low and insufficient for vulnerable households to cope with major drought shocks without external support. DRIVE will support the delivery of a sustainable package of (i) savings for resilience, (ii) drought index-insurance, (iii) digital accounts and (iv) financial education and awareness creation. The Component will be implemented regionally by The PTA Reinsurance Company. The PTA Reinsurance Company (ZEP-RE), the regional reinsurance entity of Common Market for Eastern and Southern Africa COMESA, owned by member countries, which has been assessed as having the mandate and the capacity for this role. ZEP-RE will partner with the local private and financial sector to design and deliver the products. Savings will enable pastoralists to smooth their income and manage costs of moderate droughts, backed by insurance to provide timely payouts when severe droughts occur, and digital accounts to ensure quick and effective transactions. Over time more resilient pastoralists will be better placed to access credit to expand their productive capacity. DRIVE intends to develop the financial markets and systems for savings and risk finance, with a future phase to leverage and increase access to credit. Each pastoralist joining the program will have access to a savings account, a drought index-insurance policy, and a digital payments account to pay premiums and receive payouts. Figure 4 illustrates the structure of Component 1 and the design incorporates key lessons learnt. Countries will borrow IDA funds, approve the policies underpinning Component 1, and delegate the project management responsibilities to a regional implementer to drive economic sustainability.

Component 2: **Livestock Value Chains and Trade Facilitation: This component intends to better include pastoralists in the livestock value chains and facilitate trade.** The pastoralist groups that benefit from Component 1 would be linked to investment opportunities under Component 2. The Component will support private investment in the livestock value chains so that pastoral producers can be linked to reliable markets and extract greater value addition from their livestock-rearing activities; the project will target pastoralist groups already formed. Among the three types of interventions under this component; Somalia will largely benefit from upgrading quality infrastructure. Quality infrastructure will be the main focus of the project in Somalia, and this refers to public goods of testing facilities, traceability systems, certification services, inspection services and quarantine systems. It is a critical intervention to enable formal trade and enhance the quality of livestock and livestock products, to export higher value processed products (meat). The quality standard agencies will benefit from in depth-capacity building from international firms (contracts covering all countries will be pursued), and the project will facilitate peer-to-peer learning. Capacity building will also include livestock traders, exporters, investors and local communities to facilitate the implementation and compliance of standards. The project will also support the operationalization of Mutual Recognition Agreements in the HoA.

In addition the project will provide financial support to de-risk private investments into the livestock value chains, focusing on a few demonstration investments to show that sustainable business models can emerge to benefit pastoralists. Investments will have to be private sector initiated, commercially viable, and benefit pastoral producers. The financial support will have two windows, one window for significant investments with substantial demonstration effects (i.e., that can be replicated and scaled-up) and a second window that will focus on women and youth business enterprises in pastoral areas, which could support livelihood diversification. The facility will not support industrial livestock production and rather will aim to enhance the value of pastoralist grass-fed livestock and market it. One eligibility criterion for investments will be to provide adaptation or mitigation climate Co-Benefits, thus the whole amount of the facility is expected to generate climate Co-Benefits and this will be tracked as an indicator. The management of the facility will follow a strong governance framework, with open expressions of interest, clear eligibility criteria, bankability and tracking of investments, and will be managed by a financial intermediary or an entity with appropriate governance and expertise, and ability to support the private sector, in Somalia, the implementation will be defined prior to disbursement.

4. Project Target Areas

The DRIVE project targets two types of beneficiaries.

Component 1 beneficiaries

The target beneficiaries will be pastoralist groups that are constituted around economic activities and have the potential to engage in commercial activities. Pastoralist groups Village Saving and Lending Associations (VSLA) will be supported and connected to markets. DRIVE will complement existing social protection programs and strengthen their graduation strategies. It will facilitate the transition of more productive pastoralists from the fully funded social protection programs to a program where they are better linked to value chains (Component 2) and are thus able to contribute to savings and an insurance premium. Key eligibility criteria will be: group composed of pastoralists whose main economic activity is linked to livestock rearing, and located in areas suitable for the drought insurance product; group structured around economic activities, with the capacity and willingness to engage in commercial activities; group has the willingness to save and contribute to the cost of the package of financial services provided

Component 2 beneficiaries

The project will protect them against drought shocks and connect them better to markets. It will strengthen their investment and productivity, reduce their dependency on outside aid, and help them move to commercial activities, so they receive higher income from their livestock-rearing activities.

5. ESMF METHODOLOGY

The ESMF was prepared through literature review and stakeholder discussions. The consultant undertook a review of the Project Appraisal Document and Environment and Social Review Summary (ESRS) for the DRIVE Project, as well as a review and analysis of relevant national legislation, policies, and guidelines, including the World Bank Environment and Social Standards (ESS) related to this Project.

6. **RATIONALE OF ENVIRONMENT AND SOCIAL MANAGEMEMT FRAMEWORK**
The objective of this ESMF is to identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the relevant national and World Bank's Environmental and Social Framework (ESF). This ESMF ensures that the project activities scheduled for implementation are compliant with the relevant requirements of national[1] and state-level[2] policies, regulations and legislations (including any existing school construction and operation standards) as well as the World Bank Environment and Social Standards (ESSs).

7. **RELEVANT NATIONAL AND WORLD BANK LEGAL FRAMEWORK**
Relevant national legal framework for the ESMF in this project includes: The Provisional Constitution of the Federal Republic of Somalia, the Labour Code of 1972, the Agricultural Land Law of 1975, National Environmental Policy of 2015, National Climate Change Policy 2020, Draft National Charcoal Policy, Draft National Forest Management Policy, and Draft Ozone Layer Protection Regulation. In addition to that, there are other sectoral policies, acts and regulations relevant to the labour, water, livestock, agriculture, petroleum, fish and marine resource sectors.

Relevant World Bank's environmental and social safeguards policies apply to the project are: All ESS1-10; Environmental, Health and Safety (EHS) Guidelines; and WB's Policies on GBV Risk Assessment and Mitigation Measures. A Directorate of Environment is integrated in the Office of the Prime Minister. It is mandated to draft relevant policies and legislation, including establishing of the Environmental Quality Standards, and Sectoral Environmental Assessments, Environmental Impact Assessments (ESIA). Laws on environmental governance in some FMSs are at infancy stages while in other states like Puntland and Somaliland slightly advanced than other states.

8. ***Environmental Policy, Legal and Institutional Frameworks:*** The key legal instrument for managing the environmental affairs in Somalia is the Constitution, specifically Article 25 ("Environment"), Article 43 ("Land"), Article 44 ("Natural Resources") and Article 45 ("Environment"). In addition, the Cabinet of the FGS has recently approved the National Environment Policy of Somalia.[3]

9. Article 25 of the Constitution states that "[every Somali] has the right to an environment that is not harmful to their health and well-being, and to be protected from pollution and harmful materials."

10. Article 45 (in Chapter 3 – Land, Property and Environment) exhorts "all people in … Somalia" to "…participate in the development, execution, management, conservation and protection of the natural resources and environment…" Article 43, on its part, provides guidelines on environmental and social safeguards that can be observed. However, there are no standing environmental and/or social safeguards in terms of legislated and/or drafted regulations.

11. ***Social Policy, Legal and Institutional Framework:*** The constitution in different parts prohibits discrimination against women and calls for equality among the citizens irrespective of sex, wealth, race or religion. It upholds the right of workers and prohibits sexual abuse, harassment and all forms of forced labour and slavery. Article 11 (3) of the Constitution states that: "The State must not

[1] Federal Republic of Somalia
[2] The respective policies of the federal states that are to be included for support in the project
[3] See https://twitter.com/DECC_Somalia/status/1228003267059253248, a proclamation by the Directorate of the Environment and Climate Change (DOECC) in the Office of the Prime Minister, issued on February 13, 2020

discriminate against any person on the basis of age, race, color, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth". The Labour Code further forbids work for children below the age of 12 but allows employment of children between the age of 12-15 years. The Somali Penal Code of 1962 criminalizes rape and other forms of sexual violence as well as forced prostitution. Somalia National Gender Policy (2016) includes strategies to eradicate harmful traditional practices such as female genital mutilation/cutting (FGM/C) and child marriage and to improve services for the management of GBV/SEAH cases.

12. Environmental and Social Baseline

Somalia has vast rangelands, with a large pastoral and agro-pastoral population. Their main source of livelihood is the rearing of livestock, mostly in open grazing rangelands in the semi-arid areas. These rangelands cover most of the land mass in the region. The nomadic regions in Somalia where most pastoralists reside has a staggering 99 percent of people classified as cash income poor. Livestock contributes considerably more than one third of agricultural GDP and pastoralists are the main source of meat and milk products. Somalia has the largest camel population in the world.

Somalia is prone to disasters, amplified by climate change, and recurrent severe droughts are a key factor to poverty and conflicts in pastoral economies**.**

Vegetation cover is dominated by open grasslands, shrubs and scattered woody vegetation. Pastoral nomadism is the primary way of life for most of the people Somalia. The quantity and quality of available pastures/forage have been adversely affected by prolonged and frequent dry seasons, making feed for livestock insufficient. Land and vegetation are shared by the whole community and no individual can claim or have the right to make enclosures. Management and utilization of the rangelands is controlled by the local administration and or through the clans under Somali *Xeer* customary law.

Conflicts are caused by mainly environmental, socioeconomic, and governance-related factors. Environmental factors include scarcity of land for pastures, the unsustainable increase of livestock,' Socioeconomic factors include unrecognized and undefined land rights of pastoralist communities' communities' Socioeconomic factors include youth bulge without secure land rights, settlement of returnees and displaced people in their areas of origin or in alternative locations. Governance-related factors include unregistered land, the non-functioning land registration system, the limitation of the customary land disputes-resolution system, and the disconnection between formal and customary land-dispute resolution system.

13. Potential Positive Environmental and Social Impacts. While the project's overall risk rating is substantial for both environmental and social risks. The environmental and social risks for Component 2 are considered moderate since there will be no civil works and this component will focus on Technical Assistance activities.

14. Component 1 which will be implemented by ZEP Re, has relatively limited direct impacts and is not expected to have significant indirect and induced adverse environmental impacts on human populations and/or the biophysical environment. Pastoralists would use insurance pay-outs to provide for their livestock during the early stages of drought, reducing the need for movement and tensions between pastoral communities. This is expected to reduce stress on scarce resources, reduce cross-border competition for scarce natural resources enhance resilience and decrease the risk of conflict during droughts when pastoralists cross borders.

15. Component 2 is mostly technical assistance. For this, Terms of Reference for the feasibility studies will ensure that relevant environmental and social issues are considered in conducting the studies in a manner that is consistent with the ESF, including reference to the relevant provisions of the Environmental and Social Standards. The main environmental and social risks related to this component is mainly Occupational, Health and Safety (OHS), overgrazing, groundwater and potable water source pollution, further marginalization of vulnerable groups, elite capture and sexual exploitation and abuse/sexual harassment risks.

16. When Component 1 and 2 activities are implemented, these activities will, directly and indirectly, pressure local resources and generate impacts that may result in habitat degradation or fragmentation, limited clearance of vegetation cover, pollution of groundwater and surface water resources, generation of air pollutants, noise, dust, risks to community health and safety, risks to workers' occupational health and safety, and overgrazing. Negative social risks will also include further marginalization and lack of inclusion of the very vulnerable and minority pastoralists; due to the nomadic nature of pastoralists, limited outreach, and meaningful consultations with the pastoralist communities; since not all pastoralist households will own a mobile phone plus some pastoralist areas have poor mobile connectivity that hinders access to these services.

17. ***GBV risk assessment:*** The implementation of the DRIVE project has the potential to create or exacerbate risks of varying forms of GBV in the project areas including increasing incidence of SEA, reinforcing the prevailing patriarchal socio-cultural and economic system, SEA in hiring, employment and retention practices: GBV risks related to new changes in the project-affected communities and shifts in power dynamics between community members and within households. GBV risks related to low awareness of the project-affected communities on GBV and weak institutional response.

18. ***Security risk assessment:*** Contextual Security Risks (CSRs) in the project areas include the recurring conflict over pasture and water, territorial conflicts, cattle raiding, retaliation or blood feuds, inter-ethnic specific political and historical sources of conflicts, and area-specific security risks (e.g. the movement of armed group. Likewise, the security risk assessment anticipated Project Induced Security Problems (PISPs) that could create new or exacerbate the existing conflicting situations in the project areas: conflicts/tensions between community and project security personnel; project service-induced conflicts; and conflicts arising due to cultural differences between local community and migrant workers. Given these CSRs and PISPs, classify the project areas as fragile and conflict-affected situations. A security management plan is provided in annex IX.

19. **Proposed Environmental and Social Risk Management Plan (ESRMP):** Owing to the aforesaid anticipated environmental and a social assessment was undertaken to determine the nature and scale of the anticipated E&S risks and impacts and the impact of inclusion or exclusion of most vulnerable persons. Accordingly, each subproject ESMP should be designed and implemented to manage the anticipated environmental and social risks and adverse impacts, the ESMF proposes the preparation of Labour Management Procedure, Stakeholder Engagement Plan (SEP), Gender Prevention and Response Action Plan, and Security Management Plan the guidelines for the preparation of these ESRMPs are annexed to this ESMF as Annex III.

20. **Proposed Mitigation Measures:** The proposed mitigation measures in the ESMF will apply a mitigation hierarchy. The mitigation hierarchy represents a systematic and sequenced approach to managing the potential environmental and social risks and adverse impacts of the project identified earlier. This involves the following mitigation steps: anticipation and avoidance, minimization, mitigation, and offset or compensation

21. **Monitoring and Implementation Support:** Ministry of finance has in-house environmental and social officers to apply the ESMF and applicable Standards. Zep-Re will appoint or hire environmental and social staff to support the implementation of the ESMS. The Ministry of Finance environmental and social safeguards staff will monitor the performance of the project in accordance with the Environmental and Social Management Plan (ESMP) on an on-going basis. This E&S staff will monitor the implementation of the ESMP, design corrective actions as necessary, and provide advice on compliance with the ESSs. Yet, the Bank will monitor the environmental and social performance of the project in accordance with the requirements of the legal agreement including the ESCP and provide the necessary technical support for better achievement.

22. **Implementation Arrangements:** ZEP-RE will be responsible for project and financial management of Component 1 in line with WB standards. It will provide a platform of shared services and risk infrastructure necessary for each country to scale up financial services access including insurance coverage. These services will include payments, facilitating the formation of savings groups and opening of savings accounts, insurance product design, coordination and provision of reinsurance, calculation agent, capacity building to countries and financial services providers, and awareness creation on savings and insurance. **ZEP-RE (PTA Reinsurance Company) is a specialized institution of the Common Market for Eastern and Southern Africa (COMESA).** Its mandate is to facilitate trade through insurance and reinsurance business specifically; to promote insurance penetration, to provide technical assistance to the insurance industry in the region, and to create and administer risk pools.

23. Component 2 of the project will be implemented by the Federal Government of Somalia (FGS) through the Ministry of Finance in collaboration with Ministry of Livestock, Forestry and Range, Ministry of Commerce, Somalia Bureau of Standards, Central Bank of Somalia and participating Federal Member States on relevant activities. The project will use initially the existing Project Implementation Unit (PIU) of SCALE-UP within the Ministry of Finance to coordinate the project's implementation. This unit will be responsible for the fiduciary responsibilities (procurement and contract management, financial management, environmental and social safeguards), the overall project implementation and coordination with stakeholders. The technical line ministries will be responsible for technical inputs and technical implementation of activities relevant to their sectors. Each participating agency will designate a focal point responsible for approving the ToRs, technical quality and approval of the deliverables for its respective activities. The PIU will be guided by the Steering Committee composed by all the beneficiaries of the project. The project will provide capacity building to the beneficiary institutions (including Ministry of Livestock, Forestry and Range, Ministry of Commerce, Somalia Bureau of Standards and Central Bank of Somalia) including in technical areas related to the components of the project and for general fiduciary and safeguards functions (in coordination with the PIU).

24. **Grievance Redress Mechanism (GRM)**: A systematic and functional GRM will be adopted to address the concerns of aggrieved parties (PAPs, vulnerable groups including women, IDPs, gender-sensitive issues, and community concerns). Such a mechanism will detail the processes involved in registering grievances at no cost to the aggrieved parties as mentioned above. A grievance could mean a simple query or inquiry, concern, issue, or formal complaint that bothers the lives of aggrieved parties. The layers of the GRM will be well publicized as a way of educating PAPs, recruited workers and other residents on the process. Alternative means of access, however, will be the public information centres that will be established at various project sites. At the same time, information about where complaints can be lodged will be provided by the PIU and or the consultant will be published on public notice boards, communicated verbally at all public meetings,

and outreach sessions so that there is a wider public understanding and acceptance of the mechanisms proposed for grievance redress. Where applicable, contractors will be required to have a separate GRM for workers.

25. The primary purpose of the GRM is to hear the complaints or address the concerns of aggrieved parties to a fair extent and on time. Dissatisfaction can cause an aggrieved party to act beyond expectations, which would culminate in some unforeseen repercussions that would negatively affect project implementations and stall project progression. For this reason, the GRM will strive to resolve grievances at the lowest level possible, but with opportunities for the aggrieved parties to escalate their complaint to higher tiers of the project's GRM should they be dissatisfied by the resolution of the project's lower GRM tiers. The GRM will be time bound at each tier and will include information on the opportunity access external GRM channels including arbitration/mediation, the country's legal redress systems and the World Bank's Grievance Redress Service (GRS) and the Inspection Panel, if the complainant is not satisfied with the project level GRM.

26. **Environmental and Social Screening Process:** Using the criteria for subproject screening indicated in ***Annex I*** the procedure will develop and adopt a categorization system for subprojects with clearly defined risk categories. In determining the appropriate risk classification, the DRIVE project will take into account relevant issues such as the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential environmental and social risks and impacts; and the capacity and commitment of the MoF (including any other entity responsible for the implementation of the project) to manage the environmental and social risks and impacts in a manner consistent with the WB's ESSs. All subprojects will be screened: (a) against exclusions in the National, WB or International Policies/Laws; and (b) for risk category or the severity and extent of potential environmental and social risks and impacts.

27. Based on the environmental and social screening of the sub-projects the beneficiary agencies environmental and social focal points will prepare the relevant environmental and social risk management tool (ESMP/ESIA) which will be submitted to the PIU for review and quality assurance, and thereafter to the World Bank for review and approval.

28. All the activities to be financed under the DRIVE will follow the provisions described and agreed in the SEP, LMP, GBVAP and other due diligence instruments prepared to ensure proper management of environment, social, safety and health requirements. Environmental and social monitoring seeks to check the effectiveness and relevance of mitigation measures through the implementation/operation phase. The PIU shall monitor project activities by coordinating and working closely with the implementing agencies and Environmental and Social focal points within implementing partner organisations.

29. **Public Consultations and Information Disclosure:** Preliminary stakeholders were done on 28th and 29th November 2021 from 9:00 am – 4:00pm at Jazeera Hotel as well as the virtual link was provided to the technical team who could not be physically present. Prior to the meeting, project documents including Project Appraisal Document, Draft SEP and project power point presentation was shared with the stakeholders for prior knowledge of the project information.

Key highlights for the meeting were:

- Livestock export is key to the Somalia economy, more than half of the population depend on livestock, there is a need to improve the livestock value chain and provide financial assistance to the pastoralists, this project should immediately be implemented to respond to the climate shock,

- Project shall improve the export of livestock and livestock products through connecting to the international markets,
- The project is a useful solution for the drought and other natural disasters that repeatedly affect pastorals, it also lifts up the living standard of those beneficiaries.
- Security is the major obstacles or impediments to the success of the project due to lack of strong government presence in all regions of Somalia.
- Some of the key challenges include: lack of human capital and experts, lack of collaboration between stakeholders, including national and subnational institutions.
- There is a need for continuous stakeholder engagement especially reaching religious and traditional leaders to create an understandable environment by using social mobilizers to make outreach to the remote villages as well.

The Final ESMF and other project instruments that will be prepared during implementation will be at disclosed on the website of MoF and forwarded to the Bank for disclosure at the Bank's external website in accordance with ESS10. The ESMF and the other instruments will also be availed to all stakeholders at appropriate and accessible location. Where necessary, a summary of the contents, especially the key issues of the ESMF and other instruments will be translated into Somali language(s) to enable all stakeholders understand and support the project.
Budget for implementing ESMF/ The total estimated amount needed to cover all the work to be carried out under the ESMF preparation and implementation for the sub-projects is **US$ 1,550,000.00.** The key indicative aspects that would require a cost budget include training and capacity building for the project PIU (MoF) and ZEP-RE staff. Despite the potential risks that have been identified in this ESMF, the project activities are expected to have positive impacts and positive developmental and social outcomes related to economic resilience of pastoralists and vulnerable households. The DRIVE project is expected to have more positive than negative environmental and social impacts. IA (MoF) staff; training and capacity building for the project county and local level teams; and implementation of the stakeholder engagement plan.

30. Conclusions and Recommendations

The proposed DRIVE project has the potential to significantly benefit to pastoralist communities that include:

a) social capital gains for the local community through production group activities by the pastoralist groups involved in the project;
b) improving sources of livelihood for pastoralist families and communities by building their capacity (access to markets, skills, and technology) and increasing the production
c) value and the trade value of selected production groups
d) enabling pastoralists to be more resilient to drought with a suite of financial products and services including insurance, savings, and contingent credit.
e) promoting cultural practices since, for most pastoralists, livestock is cultural property, and although maybe grown to produce meat and dairy, their roles in societies are, in many times, much broader including cultural issues related to religion that include slaughtering (for ceremonies), societal rituals, farmer social status, gender equality, control of pests and the improvement of the structure and function of the soil promoting crop production.
f) women will benefit since they use livestock as a source of meat, milk (for home consumption), transport, dung (as a sealant for burning and manure), hide, cash sale, and improving household nutritional status; and
g) reducing risks, addressing vulnerability, and enhancing resilience related to drought for pastoralists.

Despite the potential risks that have been identified in this ESMF, the project activities are expected to have positive impacts and positive developmental and social outcomes related to economic resilience of pastoralists and vulnerable households. The DRIVE project is expected to have more positive than negative environmental and social impacts. Adherence to the implementation of the proposed safeguards instruments will adequately address the potential environment and social risks and impacts associated with the project.

1 Introduction

1. The Federal Government of Somalia (FGS) is preparing the De-Risking, Inclusion and Value Enhancement of Pastoral Economy in the Horn of Africa Project (DRIVE) to be financed by International Development Association IDA to the tune of US$70 Million. The DRIVE project will support the provision of financial de-risking in anticipation of drought (i.e., insurance and financial services) for the main asset of pastoralists -livestock- to allow them to invest in their herds. It will also better connect pastoral production groups with markets, support trade infrastructure for cross-border and small-scale trade and strengthen capacity to meet international standards requirements. This will enable pastoral production groups to extract greater value addition from livestock-rearing activities. The main beneficiaries will be pastoral production groups in the Horn of Africa (HoA) generally, and Somalia specifically, that have the capacity to undertake commercial activities and move up the value chain.

2. The project will be implemented by the Federal Government of Somalia through the Ministry of Finance Ministry of Livestock, Forestry and Range, Ministry of Commerce, Somalia Bureau of Standards, Central Bank of Somalia and participating Federal Member States on relevant activities. The SCALE UP Project Implementation Unit (PIU) within the Ministry of Finance will coordinate the project's implementation in the interim.

1.1 Country context

3. The economy of Somalia mainly depends on livestock production, which has historically and culturally been the mainstay of livelihood for the majority of the people. The livestock production system in Somaliland is predominantly pastoral and agro-pastoral, with the industry providing 29.5 per cent of GDP in Somaliland and employing 27 per cent and 20 per cent of the female and male workforce, respectively in Somaliland. Livestock is the source of livelihood for pastoralists, contributes to Government revenues, and provides employment to a wide range of professionals and other service providers. Somaliland has a long history of live animal export to the Arabian Gulf states through Berbera port on the Gulf of Aden

4. There are several types of livestock production and management systems in Somalia, depending on a number of factors such as the area, availability of labor, and the sizes and types of livestock raised. However, in general, there are two main production systems: one based on nomadic pastoralism and the other on agro-pastoralism. Nomadic pastoralism is the system practiced by most of the rural population and revolves around the seasonal migration of herders in continual search of pasture and water. The movement of these pastoralists is often organized and follows a regular pattern in which clan-based groupings have their traditional grazing areas and/or common watering points and temporary camps. In some parts of the country, pastoralists co-habit with farmers to access crop residues for their animals. In other places, the pastoralists take advantage of heavy rains and floods for agricultural purposes, planting crops in areas cleared for the production of forage or grain.

1.1 Project development objective

5. The development objective of the DRIVE project is to de-risk pastoralists in the Horn of Africa in Somalia by: (i) protecting them against drought with enhanced financial access and risk transfer;

and (ii) linking them better to markets through trade facilitation and the mobilization of private capital in the livestock value chains. Project development objective indicators are:

- Number of pastoralists having access to drought insurance and financial services under the project (number), of which are female-headed households (percentage).
- Value of Private Capital Mobilized (PCM) by the project (the PCM in the results framework and data sheet reflects the capital at risk from private insurers, and the private investment mobilized from seed capital).
- Number of pastoral groups connected to markets.
- Number of trade facilitation measures supported by the project.

1.2 Project Components

6. Component 1: financial services for climate resilience: This component will de-risk pastoral groups from drought risk with a package of financial services that facilitate their connections to markets. To meet the needs of the pastoralists and provide cost-effective protection, the best financial products would be a mix of insurance and banking (savings and credit) products. Currently, in part due to the vulnerability of this community to drought shocks and limited aggregation, credit is not widely available, and savings have been shown to be insufficient for vulnerable households to cope. The initial focus of the component will be on increased access to insurance, alongside payment and savings accounts, to protect livestock assets and reduce overall losses when droughts occur. Once de-risked from drought shocks, and integrated in the value chains through Component 2, pastoralists groups will be better placed to access credit to expand their productive capacity. In time, this component could include de-risking mechanisms for financial institutions that extend credit to pastoralists, to protect them against default risk from drought shocks.

7. Pastoralists will be encouraged to build up savings to address moderate drought years, and to invest in a drought index insurance product providing protection for severe drought years. Private sector consortia will bid for premium support on the condition they provide a package of suitable financial services and incentivize pastoralists' savings based on the Drought index insurance (also called Index Based Livestock Insurance-IBLI). The advantage is to provide rapid insurance payouts at the onset of a drought, which are faster than humanitarian assistance and allow pastoralists to keep their animals alive. 30,000 households in the Somali currently benefit from this product.

8. The insurance shall provide timely payouts that pastoralists can use to buy fodder, water, and medicines to keep animals alive during stressed years. It is the only instrument which leverages additional finance from the private sector in bad years without the need to take on more debt. This effective public financial management mechanism encourages behavioral change from beneficiaries by shifting some of the responsibility for drought management to the pastoralists themselves, who have an interest in the policy as they are contributing.

9. DRIVE will support social protection graduation strategies since it will target pastoralists in groups who have the capacity to become productive. In Somalia, the Federal Government's safety net program has also been scaled up to deliver emergency cash assistance during shocks (locust invasion). DRIVE will take a more commercially driven approach and will facilitate the transition of more productive pastoralists from the fully funded social protection programs to a program where they are linked to value chains and are thus able to contribute.

Component 2: Livestock Value Chains and Trade Facilitation

10. This Component intends to connect pastoralists better to markets and strengthen the livestock value chains. The pastoralist groups who benefit from Component 1 would be linked to investment opportunities under Component 2. The Component will support private investment in the livestock value chains that can lead to higher incomes for pastoral producers; as noted, success to enhance the productivity of pastoralists will hinge on behavioral changes.

11. This component is intentionally focused to complement existing interventions on pastoral production systems, facilitate livestock trade and mobilize private investment into the livestock value chains. The component has several subcomponents depending on the need of each of participating country's' needs: Somalia will benefit from the Upgrading quality infrastructure and private investments in livestock subcomponents. subcomponent.

    a) Sub-component 2.1: Upgrading quality infrastructure: The project would support capacity building and equipment to ensure compliance of livestock and livestock products with export standards. Quality infrastructures refer to testing facilities, traceability systems, certification services, inspection services and quarantine systems. It is critical to enable formal trade and enhance the quality of livestock and livestock products, to export higher value processed products (meat). In Somalia, the quality infrastructure ecosystem is incipient, and as a result, importing countries perform their own checks which reduces the prices of Somali exports of live animals or processed meat. The WBG carried out a diagnostic in August 2020 which provided a detailed roadmap to develop the quality infrastructure system for livestock products in Somalia, and it is currently coordinating with UNIDO on the implementation. Those agencies are currently building the capacity of Somaliland Quality Control Commission, which could be institutionalized under the project and include the new Somalia Bureau of Standards.

    b) Sub-component 2.2: Trade facilitation and trade logistics: The activities under this component will include the finalization of the Livestock Master Plan, undertaking feasibility studies and market sounding, and developing mechanisms for pastoral communities' participation. The project will help aggregate groups covered under Component 1 into Farmer Producer Organizations and link them with private sector investors to increase the value of their livestock trade. The project will have coordination structures in each participating county to support engagement at the county level, including on the sensitization of stakeholders, awareness creation and capacity building, groups' formation and pastoralists' registration.

    c) Sub-component 2.3: Private investment in Livestock Value Chain de-risking facility: Seed capital to attract private investment in the value chains. The project would provide seed capital to de-risk private investments into the livestock value chains, focusing on a few demonstration investments to show that sustainable business models can emerge to benefit pastoralists. Investments would have to be private sector initiated, commercially viable, and benefit pastoral producers. The project implementation manual will include detailed eligibility criteria to select companies that will receive financial support and how such support will be structured. The project will consider social enterprises that can generate profit for shareholders and improve the livelihoods of the pastoral communities with positive impact on the environment. The supported investments will focus on natural vegetation fed-red meat and auxiliary value chains. The financial support will have two windows, one window for significant investments with substantial demonstration effects (i.e., that can be replicated and scaled-up) and a second window that will focus on women and youth business enterprises in pastoral areas.

d) Sub-component 2.4: Project Management: This will cover Ministry of Finance (MoF) PMU's costs to support the coordination of implementing agencies (ZEP-RE) and districts; ensure compliance with public accountabilities requirements for the entire project; developing annual work plans and budgets, fiduciary aspects (financial management and procurement), human resource management, Environmental and Social Framework (ESF) compliance monitoring, development and implementation of a Management Information System and Information Communication Technology (ICT)-based platforms, monitoring and evaluation, and a communication strategy and citizen engagement. This will also include IA's cost of undertaking the due diligence of the projects supported under the Livestock Value Chain de-risking Facility.

12. This component will be closely coordinated with the IFC. IFC ongoing or upcoming advisory programs in Ethiopia, Kenya and Somalia will inform the identification of activities required to attract private sector investment. The outcome of collaboration will provide more insights on how public resources can be leveraged to de-risk investments which IFC could support in future.

Proposed project activities in Somalia

Table 1-1 below gives the profile of the possible project activities under Component 2 to be financed:

Table 1-1 : Summary of Activities to be Financed under the Project under Component 2

Category of activities	Potential activities
Quality infrastructure advisory services and equipment	Upgrading quality infrastructure for livestock. (i) TA on quality infrastructure in the livestock sector to the Somalia Bureau of Standards (SBS)and the Somaliland Quality Control Commission (SQCC) to use of testing equipment, conduct quality and safety tests of livestock products, training and others; (ii) procurement of equipment and testing laboratory supplies; (iii) TA and capacity building to MoCI, Somalia Bureau of Standards (SBS) and SQCC on adoption of national quality infrastructure standards for livestock products, identification of facilities for accreditation and appropriate equipment for product certification and testing services of livestock products, effective and efficient operations of the laboratory including the hiring of an international resident advisor to work with the staff on a part-time basis for one year as they work to develop the quality infrastructure system.
Facilitation of regional livestock trade with advisory and equipment	TA to identify key trade infrastructure facilities (rest stops, cold chain, veterinary centers, feed access, quarantine centers), regulations and feasibility study for the main facility gaps along the Jigjiga-Berbera corridor and Mogadishu Port based on the findings of the assessment (preparation study)
	Digitization of trade data on livestock for the trade portal, marketing information, trade and transport procedures and support for maintenance.

Category of activities	Potential activities
	Assessment of sharing information through the trade portals among the HOA countries
	Develop a traceability system supporting digitization of certification on the Jigjiga-Berbera corridor and Mogadishu Port Assessment of Trade infrastructure and logistic gaps: Mogadishu seaport and Ethiopia Berbera corridor Jigjiga – Tog Wajjale – Somaliland - Hargesia – Berbera. Support for establishing a trucking system to reduce cumbersome procedures for obtaining the cross-border road transport permits (Ethiopia-Berbera corridor). Implementation of the loading and unloading animal's code to prevent overloading of animals on truck transport and into ships. Feasibility study for , the establishment of a single window, development of trade and transport logistics facilitation guidelines, and assessment of the creation of electronic linkages among the different HoA countries when submitting export and import documents.
Support for local productive capacities, in connection with the regional livestock corridor and niche markets	Identification and development of local value chains for entering new markets by establishing links between local pastoralists and international buyers and promoting cost-effective freight forwarding and export logistics, including cold chain.
	Improved compliance of livestock exported products in the niche markets identified by the trade infrastructure study.

1.3 Project Beneficiaries

13. The term "pastoralists or agro-pastoralists" covers a wide range of people and situations and this project will be targeted to those that are willing to engage in commercial activities.

14. The project targets four types of beneficiary 'futures' depending on their access to markets and rangelands as categorized in Figure 1.1. *The first group* includes pastoralists or agro-pastoralists that live in the arid and semi-arid areas of the country, especially the pastoralists in groups who have the capacity to become productive. For this group, the eligibility criteria under Component 1 are any pastoralist group that can bid for premium support under the project as long as: (a) the group is composed of pastoralists whose main economic activity is livestock rearing; (b) the group is structured around economic activities; (c) the group has the capacity and willingness to engage in commercial activities (that is, sell livestock for commercial purpose); and (d) the group has the willingness to contribute to the cost of the package of financial services provided.

15. Eligibility criterion under Component 2 states that the pastoralist groups that benefit from Component 1 should be linked to the investments supported under Component 2 – seed capital. *The second group* target private investors in the livestock value chains that can lead to higher incomes for pastoral producers. This identifies the involvement of private firms, that bid for premium

support, large business window and women and youth-owned enterprises window. Detail eligibility criteria in for of Environment and Social Screening Checklist for the proposed project beneficiaries is Annexed as Annex I.

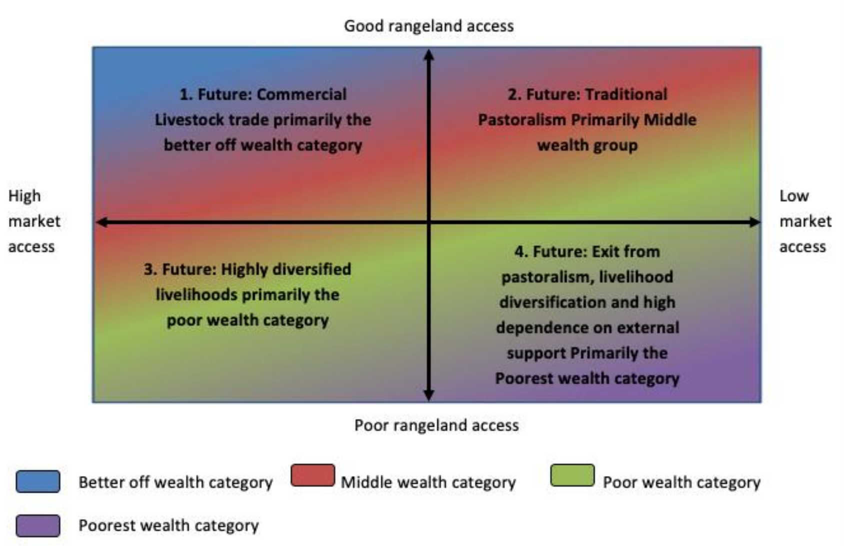


Figure 1-1: Different types of pastoralists

Source: Rob Allport, Kimetrica adapted from the Futures of Pastoralism by Andy Catley, Tufts University

1.2 OBJECTIVE AND METHODOLOGY OF ESMF

1.2.1 Objective of the DRIVE ESMF

16. The objectives of the Environmental and Social Management Framework (ESMF) is to clarify E&S Standards, processes, and mitigation principles, organizational arrangements and design criteria to be applied to subprojects, which are to be prepared during project implementation by PIU.

17. The specific objectives of this ESMF are:

- To ensure that the implementation of the project, and that it will be carried out in an environmentally and socially sustainable manner.
- To provide information about scope of adverse E&S risks and impacts expected during subproject planning, construction and operation; describe the approach to mitigation and monitoring actions to be taken; and cost implications.
- To clarify the roles and responsibilities of PIU with regard to E&S due diligence, management of risks and impacts, and monitoring.
- To provide the project implementers with an E&S screening process and risk & impact management procedures that will enable them to identify, assess and mitigate potential E&S impacts of subproject activities, including through the preparation of a site-specific Environmental and Social Impact Assessments (ESIA), Security Management Plan and/ or Environmental and Social Management Plans (ESMP), Stakeholder Engagement Plan (SEP) among other safeguards instruments where applicable.

- To protect cultural heritage from the adverse impacts of project activities and support its preservation, and
- 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 ensure for effective and inclusive engagement.

1.2.2 Methodology for the DRIVE ESMF

18. The ESMF was prepared through literature review and stakeholder discussions. The consultant undertook a review of the Project Appraisal Document and Environment and Social Review Summery (ESRS) for the DRIVE Project, as well as a review and analysis of relevant national legislation, policies, and guidelines, including the World Bank Environment and Social Standards (ESS) related to this Project.

19. The preparation of ESMF for DRIVE project depends on multiple sources of data. The next sub-sections highlight the major elements of the methodology.

20. The project will be implemented across the country. The primary target of the project will be pastoralists organized in groups with some access to rangelands or markets, where group formation exists or has been supported by other development partners, and which require additional support to commercialize production**.** Component two will focus on quality infrastructure development which will majorly TA undertaken within government agencies and institutions, and seed capital to be advanced to private institutions meeting the laid down criteria in this ESMF and other instruments.

2 REVIEW OF THE POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 FEDERAL LEVEL OVERVIEW

21. This section describes the existing policy, legislative and institutional framework that will be important for consideration in the design, implementation, monitoring and evaluation of the project. Somalia's policies and legislations are still nascent in many ways including its ability to assess the potential impact of environmental and social aspects of projects.

22. A process of Strategic Environment Assessment could be used as an important internationally recognized tool to identify, in all sectors, policies and laws where environmental issues are, or could be important. However, this will not be possible in the context of the De-Risking Inclusion and Value Enhancement of Pastoral Economies Project (DRIVE) for which this ESMF has been prepared because of the nature of the project.

23. The Somali Cabinet, on February 13, 2020, approved the National Environmental Policy. The stated goal of environmental policy is to improve the health and quality of life of the Somali people. The Directorate of Environment and Climate Change under the OPM is also drafting the regulations to operationalize and implement the environmental legal framework, the process of drafting the Environmental and Social Impact Assessment Regulation, together with the Environmental and Social Audit which is underway. Other relevant regulatory frameworks include National Climate Change Policy 2020, Draft National Charcoal Policy, Draft National Forest Management Policy, and Draft Ozone Layer Protection Regulation. In addition to that, there are other sectoral policies, acts and regulations relevant to the labour, water, livestock, agriculture, petroleum, fish and marine resource sectors.

2.1.1 Provisional Constitution of the Federal Republic of Somalia 2012

Article 12 of the Constitution addresses public assets and natural resources. The provisional constitution contains a number of parameters relevant for various operational activities in the country.[4]
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 stipulated 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 workplace. Every labor law and practice shall comply with gender equality in the workplace.

24. 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. It established property rights, and Article 26 (section 1 and 2) state that a) every person has the right to own, use, enjoy, sell and transfer property, b) the state may compulsorily acquire property only if doing to in in the public interest, c) any person whose property has been acquired in the name of public interest has the right to just compensation form the State as agreed by the parties or decided by a court.

[4] SCORE - ESMF

25. On the environmental front, Article 43 provides guidelines on environmental and social safeguards that can be observed.

26. Article 43 further states: a) land is Somalia's primary resource and the basis of the people's livelihood.; b) land shall be held, used and managed in an equitable, efficient, productive and sustainable manner, c) the FGS shall develop a national land policy, which shall be subject to constant review, d) no permit may be granted regarding the permanent use of any portion of the land, sea or air of the territory of the Federal Republic of Somalia, e) the FGS, in consultation with the FMS and other stakeholders, shall regulate land policy, and land control and use measures.

27. Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. Furthermore, all people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment. 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.

28. The Labour Code of 1972[5] stipulates that all contract of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.

29. 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.

30. The 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 regard 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.

31. The Labor Code further forbids work for children below the age of 12 but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade union.

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

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

33. 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.

34. The Agricultural Land Law (1975). The law transfers all land from traditional authorities to the government. Individuals desiring land were to register their holdings within a 6 months period. The law does not recognize customary land holdings.

35. The National Environmental Policy (2015) promotes the use of appropriate environmental assessment instruments. National Climate Change Policy, 2020: This environment and climate change policy brief aims at briefly presenting key environmental sustainability challenges and opportunities in Somalia, their linkages to poverty reduction and the millennium development goals three, four and five.

2.2 Institutional capacity for environmental management

36. A Directorate of Environment is integrated into the Office of the Prime Minister at the federal level. It is mandated to draft relevant policies and legislation, including establishing of the Environmental Quality Standards, Sectoral Environmental Assessments, and Environmental Impact Assessments (EIAs). Laws on environmental governance in some FMSs are at nascent stages while in other states like Puntland and Somaliland, slightly more advanced than other states. Overall environmental impact assessment capacity is nascent. Somalia is signatory to some international conventions, and at the FGS level has enacted a number of key environmental Acts recently. However, necessary regulations have not been formulated yet.

37. Most States have Ministries of Environment which manage environmental issues. The State Ministries of Environment are to be consulted before any infrastructure activities in their respective state with potential environmental and social risks and impacts. The institutional arrangement for the Safeguard related matters including the approval process is yet to be established or agreed upon. Some States and municipalities have offices responsible for land adjudication matters.

38. For the project implementation, this project will rely on the existing national environmental and social legal frameworks and World Bank ESSs.

2.3 World Bank's Environmental and Social Framework

39. Since October 2018, all World Bank funded Investment Projects are required to follow the Environmental and Social Framework (ESF) consisting of ten (10) Environment and Social Standards (ESSs). These ESSs set out their requirement for the identification and assessment of environmental and social risks and impacts associated with any project. The ESSs supports the projects in achieving good international practice relating to environmental and social sustainability, assist them in fulfilling their national and international environmental and social obligations, enhance transparency and accountability and ensure sustainable development outcome through ongoing stakeholder engagement. The following is a summary of the ESF and its ESS's requirements:

2.4 World Bank Environmental & Social Standards

40. It sets out the mandatory requirements of the Bank in relation to the projects it supports through Investment Project Financing. The types of E&S risk and impacts that should be considered in the environmental and social assessment. The required E&S management plan as well as the use and strengthening of the Borrower's environmental and social framework for the assessment, development and implementation of World Bank financed projects where appropriate.

41. World Bank Environment & Social Framework https://www.worldbank.org/en/projects-operations/environmental-and-social-framework. This includes the following ESS:

- ESS 1: Assessment and management of environmental and social risks and impacts;
- ESS 2: Labor and working conditions;
- ESS 3: Resource efficiency and pollution prevention and management;
- ESS 4: Community health and safety;
- ESS 5: Land acquisition, restrictions on land use and involuntary resettlement;
- ESS 6: Biodiversity conservation and sustainable management of living natural resources;
- ESS 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities;
- ESS 8: Cultural heritage;
- ESS 9: Financial intermediaries;
- ESS 10: Stakeholder Engagement and Information Disclosure.

42. The World Bank Group Environmental, Health and Safety Guidelines, are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors. For complex projects, use of multiple industry-sector guidelines may be necessary. The Environmental Health and Safety relevant to the sub-project activities relating to livestock processing industries such as Abattoir/meat production and dairy products that may generate, store or handle any quantity of hazardous and non-hazardous waste are required to comply with the following guidelines:

- The implementation of livestock processing industry sub-project will avoid the generation of hazardous and nonhazardous waste. Where waste generation cannot be avoided, it will minimize the generation of waste, and reuse, recycle and recover waste in a manner that is safe for human health and the environment. If the generate waste cannot be reused, recycled or recovered, the sub-project will treat, destroy, or dispose of it in an environmentally sound and safe manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material.
- If the generated waste is considered hazardous, the project will comply with existing requirements for management (including storage, transportation, and disposal) of hazardous wastes including national legislation and applicable international conventions, including those relating to trans-boundary movement. Where such requirements are absent, the project will adopt GIIP alternatives for its environmentally sound and safe management and disposal.
- Livestock processing industry activities that generate waste should characterize their waste according to composition, source, types of wastes produced, generation rates, or according to local regulatory requirements.
- The implementation of livestock processing industry sub-project will avoid or minimize the potential for community exposure to hazardous materials and substances that may be released by the project. Where there is a potential for the public (including workers and their families) to be exposed to hazards, particularly those that may be life threatening, the sub-project

implementation will exercise special care to avoid or minimize their exposure by modifying, substituting, or eliminating the condition or material causing the potential hazards.

- The project will implement measures and actions to control the safety of deliveries of hazardous materials, and of storage, transportation and disposal of hazardous materials and wastes, and will implement measures to avoid or control community exposure to such hazardous material.

43. The Guidelines focuses on four key aspects namely: Environmental (Air Emissions and Ambient Air Quality, Energy Conservation, Wastewater and Ambient Water Quality, Water Conservation, Hazardous Materials Management, Waste Management, Noise and Contaminated Land); Occupational Health and Safety (General Facility Design and Operation, Communication and Training, Physical Hazards, Chemical Hazards, Biological Hazards, Radiological Hazards, Personal Protective Equipment (PPE), Special Hazard Environments and Monitoring); Community Health and Safety (Water Quality and Availability, Structural Safety of Project Infrastructure, Life and Fire Safety, Traffic Safety, Transport of Hazardous Materials, Disease Prevention, Emergency Preparedness and Response); Construction and Decommissioning (Environment, Occupational Health & Safety and Community Health & Safety). The World Bank Group General Environmental, Health and Safety ("EHS") Guidelines (http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/ifc+sustainability/our+approach/risk+management/ehsguidelines) and specific sectoral EHS Guidelines.

- The World Bank good practice note on Animal Health and related risks, applies to Investment Project Financing (IPF) under the ESF involving live domestic animals (including livestock, food-producing, and working animals, terrestrial and aquatic animals). It includes reference to scenarios and activities involving agriculture, landscape, and environment, water, forests, education, etc., wherever risks may be identified and managed. Food safety aspects have been excluded from the scope of this GPN, which will be addressed elsewhere. The GPN does not address the impact on animals caused by other types of projects such as, for example, the destruction of habitat in a road or dam construction. This GPN addresses animal diseases, zoonoses, veterinary public health, and animal health and welfare, with focus on: (i) diseases and conditions having an impact on animals; and (ii) diseases of animals transmissible to humans and having an impact on communities.https://thedocs.worldbank.org/en/doc/637081608213776643029002202 0/original/AnimalHealthGoodPracticeNote.pdf

- The World Bank Environmental, Health, and Safety Guidelines for Mammalian Livestock Production include information relevant to cattle ranching and farming, dairy farming, and hog and pig farming. Sheep and goat farming operations, while not explicitly discussed, are like the operations included in this document, and the recommendations presented here are also generally applicable. It does not address feed production, dairy processing, or meat processing, which are covered under other EHS Guidelines.

- This guidance note recognizes environmental issues in mammalian livestock production that include waste management · wastewater · air emissions · hazardous materials management · ecological impacts · animal diseases. The guidance note also addresses agriculture as one of the worst fatal accidents and occupational health records of any major employment sector. Occupational health and safety hazards related to the daily operations of the mammalian livestock sector include Exposure to physical hazards, Exposure to chemical hazards, Exposure to biological agents and Confined spaces. https://www.ifc.org/wps/wcm/connect/737ca363-552e-4b70-b9e0-c234e7fca120/Final%2B-%2BMammalian%2BLivestock%2BProduction.pdf?MOD=AJPERES&CVID=nPth8FV

WB's policies on GBV Risk Assessment and Mitigation Measures

44. In addition to the Environmental and Social Management Framework described before this, the World Bank provides Good Practice Note (GPN) in 2018, the World Bank has developed this GPN to help in identifying risks of SEA/SH – as opposed to all forms of GBV that can emerge in IPF involving major civil works contracts – and to advise Borrowers on how to best manage such risks. The GPN builds on World Bank experience, relevant international instruments, and good international industry practices, including those of other development partners. Taking such wide-ranging good practices and policy experiences, GPNs are prepared to support the implementation of the Environmental and Social Framework (ESF) in World Bank financed operations.

45. This GPN also forms part of the World Bank's response to the 2017 recommendations of an independent Task Force of external experts (hereinafter called the "2017 GBV Task Force Report"), which provided guidance on how the World Bank could strengthen its systems to prevent and mitigate GBV, in particular SEA/SH, in the projects it finances.

46. This GPN underlines the World Bank policy that no country, community, or economy can achieve its potential or meet the development challenges of the 21st century without the full and equal participation of women and men, girls and boys. The World Bank is therefore committed to closing gaps between males and females globally for lasting impact in tackling poverty and driving sustainable economic growth that benefits all. The GPN is structured around three key steps that cover project preparation and implementation:

1. Identify and **assess** the risks of SEA/SH, including social and capacity assessments. Ideally, this is done during project preparation, with the understanding that SEA/SH risk assessment is a continuous process and should take place throughout the project life cycle as SEA/SH can occur at any moment.
2. **Address** the risks by identifying and implementing appropriate SEA/SH risk mitigation and monitoring measures.
3. **Respond** to any reported GBV allegations, whether related to the project or not. Projects should include effective monitoring and evaluation (M&E) mechanisms, which meet the World Bank's requirements on SEA/SH and allow for reporting on allegations that are project-related and for monitoring case follow-up.

Table below shows the specific ESSs that are applicable to the proposed project and their relevance in terms of rationale. The standards range from ESS 1 to ESS10.

Table 2 : Environmental and Social Standards Relevant to the DRIVE Project

Environmental and Social Standard (ESS)	Rationale
ESS1: Assessment and Management of Environmental	The project is likely to impact on natural resources such as movement of livestock may cause land degradation, limited clearance of vegetation cover, pollution of underground water and surface water. Use of various chemicals for spraying livestock is likely to lead to significant risks to human health and a high potential for adverse ecological effects. The potential negative environmental impacts and risks associated with various project

Environmental and Social Standard (ESS)	Rationale
and Social Risks and Impacts	activities may lead to spillage or leakage of hazardous materials during transportation, handling and storage of livestock and other products, during treatment and disposal which will likely lead to the contamination of the environment and potential health hazards to the people and communities. Mitigation measures for environmental impacts have been proposed in this ESIA In terms of social risks, with the current COVID-19 crisis, effective communication with affected people, culturally appropriate communication for pastoralists and other traditional local communities, stakeholder consultation and engagement activities will be especially challenging to ensure timely and meaningful consultations to meet project and stakeholder needs. The pre-existing low status of women, as a result of socio-cultural practices pre-disposes women and girl's to high prevalence of GBV, acceptability such as early/forced marriage, intimate partner violence and high levels of poverty, are likely to heighten the community's vulnerability to sexual exploitation and abuse (SEA). De-risking pastoralists may result increased wealth for men allowing them to marry more women and marginalize women more. With the possible deployment of external personnel such as livestock professionals, contracted and extension workers, would predispose women and girls to may face growing levels of SEA. A GBV Action Plan has been prepared. Identify and include the vulnerable communities and groups throughout the project cycle including project design, consultation and implementation as per the Social Assessment.
ESS2: Labor and Working Conditions	Use and application of various chemicals on the livestock could lead to potential adverse effects on the health of the people. Other risks by workers may include Gender Based Violence (GBV) and Sexual Exploitation and Abuse harassment. The COVID-19 pandemic also presents a risk to workers who in interacting with local communities may get exposed to the pandemic. Increased livestock may result to increased demand for herders, who in most of the pastoral communities, are young boys for cattle rearing and youth girls for small livestock rearing pre-deposing school going children to child –labor practices. The World Bank Technical Guidelines on interactions during COVID-19 will be observed during project implementation. Labor management procedures, guided by national laws, have been developed. A GBV Action Plan is part of this ESMS.
ESS3: Resource Efficiency and Pollution Prevention and Management	The operation of livestock production will bring impact and pressures on the environment including consumption of resources like water and pasture, this may increase stress on scarce resources, and lead to cross-border competition for scarce natural resources with risks of conflict during droughts. The project will reduce overgrazing (as pastoralists receive insurance payouts to buy fodder in times of severe drought, and do not need to increase herd size in anticipation of drought-related losses). In addition, the project will reduce the need for movement and tensions between pastoral communities. Through drought Index Insurance enabled by satellite technology which monitors the conditions of pasture on the ground such that when the level of pasture falls below a certain level, the insurance payout is triggered automatically through mobile money. Pastoralists would use insurance payouts to provide for their livestock during the early stages of drought. However, increase in herd size with insurance payouts cannot entirely be ruled out and this, under certain circumstances, may lead to (a) soil degradation due to overgrazing (Insurance will be provided to only those pastoralists who have 5 tropical livestock units

Environmental and Social Standard (ESS)	Rationale
	(TLUs) per household. The possibility of more households keeping livestock and household with lesser TLUs increasing their herd size to meet the requirement of 5 TLUs cannot be ruled out. An increase in livestock number could lead to overgrazing and degradation of common grazing grounds), and (b) water contamination from animal waste and its disposal. To address these environmental impacts, ZEP-RE's ESMS includes a guidance note for insurance intermediaries on how to identify, assess, manage, and monitor the environmental and social risks and impacts of the insured activities on an ongoing basis. While at the global level, livestock is an important contributor to Greenhouse Gas Emissions (GHG), in the Horn of Africa, where pastoralism is the dominant livestock production system GHG emission is the lowest in the world (both in absolute value and per capita). Greenhouse gas emission of pastoralism is lower than combined extensive/intensive livestock husbandry. As a result, the most pressing concern regarding pastoralism in the HOA is more adaptation than mitigation.
ESS4: Community Health and Safety	The project implementation team will be made up of mostly Government Civil Servants, the Labor Management Plan prepared will provide mitigation measures for employees to deal with risks associated with occupation safety and health. Under component 1, cash payments can cause shifts in power dynamics between the community members and within the household which will exacerbate the risk of non-SEA/SH gender-based violence at a household and community-based level. A GBV Action Plan will be prepared to manage these risks. Cross-border competition for scarce natural resources, community conflict, and insecurity remains a persistent challenge in arid and semi-arid areas where pastoralists live in all participating countries. Security risks associated with the project areas will be assessed and mitigation measures proposed in the ESMF.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Any subproject that will cause project-related land acquisition and restrictions on land use that can have adverse impacts on communities and persons will be excluded from the project in line with the ESMF.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Project of this nature that supports pastoralism over a large region will involve natural habitats even protected areas. The project will mitigate this risk through design, awareness-raising, and capacity building. The project by design is expected to bring benefits to the protection of natural habitats and natural resources through Drought index insurance, using satellite data. Overgrazing will be reduced as pastoralists receive insurance payouts to buy fodder in times of severe drought, and do not need to increase herd size in anticipation of drought-related losses)., In the long term this will lead to sustainable pastoralism with benefits for biodiversity conservation, and protection of land and ecosystems. The ESMFs include measures for minimizing impacts on natural habitats. The DRIVE country-level ESMFs and national teams will oversee the design of subprojects and design appropriate environmental assessment processes, including mitigation measures and coordination among the relevant stakeholders during subproject preparation and implementation. The exclusion list provided in the ESMF will be utilized

Environmental and Social Standard (ESS)	Rationale
	during the screening exercise. The exclusion list includes exclusion of activities that may cause long term, permanent, and/or irreversible (e.g. loss of major natural habitat) impacts and activities that have a high probability of causing serious adverse effects to human health and/or the environment.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	The PIU will conduct screening and community consultation at each sub-project area and confirm the presence or absence of IP/Sub-Saharan Historically Underserved Traditional Local Communities as per ESS7 to determine the applicability of the standard. If ESS7 groups are found in implementation areas, then IPPPs shall be prepared.
ESS8: Cultural Heritage provides continuity in tangible and intangible forms between the past, present and future. It sets out measures designed to protect cultural heritage throughout the project lifecycle.	The project does not envisage any civil works. But under the Technical Assistance studies, under the facility to de-risk may involve excavations, movement of earth, flooding, or other changes in the physical environment, ESS8 will be relevant for the studies. Having an ancient civilization that has remained in the same geographic area throughout, the project countries have an exceptionally rich cultural heritage, particularly in the form of both natural and human-made religious sites, and undocumented as well as documented archeological sites. There is thus a risk of subprojects involving earth-moving (such as upgrade of quarantine centers and market centers) encountering, disturbing, and possibly destroying, cultural heritage. The ESIA developed will capture all environment and social risks and impacts related to ESS8 including providing chance find procedures.
ESS9: Financial Intermediaries	Component 1 is to be implemented through a FI (ZEP-RE); Component 1 of the project includes the scale-up of financial protection for pastoralists across at least three Countries in the HoA with a package of financial services, including drought insurance. The use of an agency for insurance products (ZEP-RE) is considered the use of financial intermediaries (FI) engaged in transactions related to the use of proceeds of World Bank financing. The ZEP-RE ESMS is currently going through an update and will be endorsed by the senior management of ZEP-RE, consulted, and disclosed before project effectiveness. The private sector entities will also put in place an ESMS for screening business activities, to be financed by DRIVE, for their E&S impacts. The updated ESMS will include (a) policy statement, endorsed by senior management and publicly disclosed, outlining the scope of the ESMS and applicable technical requirements for business activities financed; (b) procedures for screening, identification, assessment, mitigation, monitoring, and reporting of E&S risks; (c) guidance note for insurance intermediaries on how to identify, assess, manage, and monitor the environmental and social risks and impacts of the insured activities on an ongoing basis; (d) E&S requirements for insurance intermediaries; (e) institutional capacity, roles and training; and (e) external communication. ZEP-RE's ESMS includes an E&S Guidance Note for insurance Companies and NGOs. The note provides specific guidance to the Insurance Intermediaries on the E&S risks present in pastoral livestock herding activities, on how

Environmental and Social Standard (ESS)	Rationale
	to address the E&S risks, how to check for compliance with the eligibility criteria, and how to sensitize pastoral groups about the identified E&S risks.
ESS10: Stakeholder Engagement and Information Disclosure	A Stakeholder Engagement Plan (SEP) has been prepared to ensure the promotion of transparency through stakeholder participation and public information disclosure as well as to ensure broad stakeholder engagement and participation in the DRIVE project planning and implementation processes. The SEP has identified key existing and potential stakeholders and described, among others, their level of interest, influence, and support to the project and in its planning and implementation. It further describes the means, timelines, and frequency of communication with each stakeholder/group, grievance mechanisms to be deployed, monitoring, and reporting. ZEP-Re will develop an external communication and complaints mechanism which will be cascaded to all the beneficiary agencies.

Table 2-3: GAP analysis for WB and FGS (Somalia) / Somaliland Polices, Laws & regulations relevant to this ESMF

ESF Scope	Bank Standards	National Laws and Requirements	Gaps	Proposed GAP fill Measure
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. These are done through development of EIA instruments, Environmental impact screening, Social impact screening, Public consultations and monitoring of environmental and social data.	A range of requirement is required to satisfy, EIAs, regional or sectoral ESs, EMPs. Screening procedures developed for projects and sub-projects. The Bank requires the Borrower to initiate consultations with project-affected persons and other interested parties, regular monitoring and evaluation and Requirement by the Bank for specific description of institutional arrangement and implementation schedule.	There are no clear legal framework and procedures.	Laws have not been developed yet, ESIAs not incorporated in federal and FMSs laws yet.	WB ESSs to guide.
ESS 2: Labor and Working Conditions				

ESF Scope	Bank Standards	National Laws and Requirements	Gaps	Proposed GAP fill Measure
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.	The Bank puts emphasis on the identification and characterization of different types of workers (project workers, direct workers, contracted workers, community workers, primary supply workers) to manage different types of labour risks. Several provisions made under ESS2 to safeguard the workers, promote safety at work and ensure that they have a viable means of communicating grievances and receiving redress.	Provisional Constitution of the Federal Republic of Somalia Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labour 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. Article 14 prohibits Human trafficking: A person may not be subjected to slavery, servitude,	The Labour Code is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP. The new labour code, amending the code from 1972, has not been passed yet. The implementation of the existing articles in practice may not be very strong.	ESMF and the Labour Management Procedures (LMP) to guide the borrower PIU .

ESF Scope	Bank Standards	National Laws and Requirements	Gaps	Proposed GAP fill Measure
		trafficking or force labour offences. 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 (d) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labour inspector for pre-approval. The Puntland Sexual Offences Act 2016 prohibits sexual harassment.		

ESF Scope	Bank Standards	National Laws and Requirements	Gaps	Proposed GAP fill Measure
ESS 3: Resource Efficiency and Pollution Prevention and Management				
The Objectives of ESS 3 are: To support Pollution prevention; and to avoid or minimize generation of hazardous and non-hazardous waste.	This ESS requires the Borrower to undertake a health and safety risk assessment of any existing pollution which may affect communities.	• No known national statutes in support of periodic environmental audits. • No national pollution standards known at the time of developing this ESMF. • No known national legislation or policies on management of hazardous wastes.	There are no supporting legislative frameworks for pollution prevention and management. There are no approved hazardous waste disposal sites in Somalia.	ESMF to guide the borrower on pollution prevention and management. ESMF to guide the borrower on the management of both.
	ESS 4: Community Health and Safety			
The Objectives of ESS 4 are: To ensure health of the community members.	The ESS anticipates that the project will put measures in place to anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine	<u>The Somali Penal Code of 1962</u>. 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	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	, SEP, GBV Prevention and Action Plan and Security Management Plan developed for this project will guide the reduction of harm to communities affected by the project.

ESF Scope	Bank Standards	National Laws and Requirements	Gaps	Proposed GAP fill Measure
	and non-routine circumstances. Further, it provides for the avoidance or minimization of community exposure to project-related traffic and road safety risks, diseases and hazardous materials.	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.	standards of protection from sexual and gender-based violence and are not victim centered.	
	ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement This ESS 5 is considered not relevant.			
	ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
Biodiversity Restoration.	In accordance with the mitigation hierarchy	Somalia has developed National Biodiversity Strategy and	No draft management plan is provided	The project to be guided by the ESMF and relevant provisions of ESS6 on biodiversity restoration

ESF Scope	Bank Standards	National Laws and Requirements	Gaps	Proposed GAP fill Measure
	provided in ESS1 and with the requirements of this ESS, Borrower is required to ensure that biodiversity expertise is utilized to develop and implement a Biodiversity Management Plan.	Action Plan (NBSAP), which calls for action to be taken to manage the 40+ identified biodiversity hotspots.	in Somalia's NBSAP.	where the project interfaces with biodiversity and other environmentally sensitive areas
ESS 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities				
	Screening process will confirm any presence of Indigenous people in the various project areas.			
	ESS 8: Cultural Heritage			
Management of risks on tangible and intangible cultural heritage, including legal protection to cultural heritage sites	This ESS requires the Borrower to manage risks on tangible and intangible cultural heritage, including identification of the presence of all listed legally protected cultural heritage areas affected by the project.	Somalia has a National Strategy for Culture. Article 16 of the constitution of Somaliland: Promotion of Knowledge, Literature, Arts and Culture. Sub Article 3 states that "The state shall promote the Arts and the modest culture of the society whilst at the	The law regarding the management of Physical Cultural Resources exists as a draft	The ESMF to guide the Borrower.

ESF Scope	Bank Standards	National Laws and Requirements	Gaps	Proposed GAP fill Measure
		same time benefiting from the knowledge of other world societies. Literature, the arts, and indigenous sports shall be specifically encouraged whilst Islamic behavior is observed.		
ESS9: Financial Intermediaries				
The Objectives of ESS9 are: To set out how the FI will assess and manage environmental and social risks and impacts associated with the subprojects it finances. To promote good environmental and social management practices in the subprojects the FI finances. To promote good environmental and sound human resources management within the FI.		No laws governing FI in managing ESMP	There is no explicit law requiring the private sector to put in place an Environmental and Social Management System.	ZEP-RE as implementors of component 1 and the private sector entities will put in place an Environmental and Social Management System..
ESS 10: Stakeholder Engagement and Information Disclosure				
Meaningful engagement of stakeholders in the project activities from planning to implementation levels	The World Bank anticipates that the project will establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and	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	The law on the right of access to information currently only exists as a draft	The Project will implement stakeholder consultations throughout the lifetime of the project, as per the SEP. The PIU will ensure that a grievance mechanism for the project is in place, in accordance with ESS10 as early as possible.

ESF Scope	Bank Standards	National Laws and Requirements	Gaps	Proposed GAP fill Measure
	maintain a constructive relationship with them, project-affected parties. Further, the project will 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. The project affected persons should be provided with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.	shall enact a law to ensure the right of access to information		SEP shall be disclosed to all stakeholders and made available to the stakeholders in public areas,

3 Baseline Environmental and Social Conditions

3.1 Environmental Baseline

47. This section describes the overall baseline condition of Somalia in terms of biophysical environment, as well as the socio-economic background. The baseline conditions obtaining in the three affected states of Somalia mentioned are principally similar to those generally obtaining in Somalia as a nation, except for minor variations.

3.1.1 Climate

48. **Climate:** Somalia is a large, relatively flat country, with an arid or semi-arid climate and prone to severe droughts and floods. Its twelve million people mostly support themselves through nomadic pastoralism and agriculture. They are among the poorest in the world, and although too few data are available to allow the country to be ranked relative to others according to the Human Development Index (HDI), it is believed to score very poorly on all HDI indicators.

49. As alluded to earlier, Somalia has a warm desert climate in the north and a semi-arid climate in the south. The country is characterized by four seasons: between the two monsoons, there are irregular rain and hot and humid periods. From April to June, there is the main rainy season, Gu. This is followed by the dry Xagaa season before the Dayr provides further rainfalls from October to December, with approximately 500 mm rainfall annually in the northern highlands, 50-150 mm along coast, and 300-500 mm in the southwest. The annual cycle is completed as the dry Jilaal season stretches from December to March. The climate in the Horn of Africa is affected by the Indian Ocean's variable sea-surface temperatures and the El Niño–Southern Oscillation (ENSO) cycle.[6] Different ENSO phases have diverse impacts during seasons and across different parts of the Horn.[7]

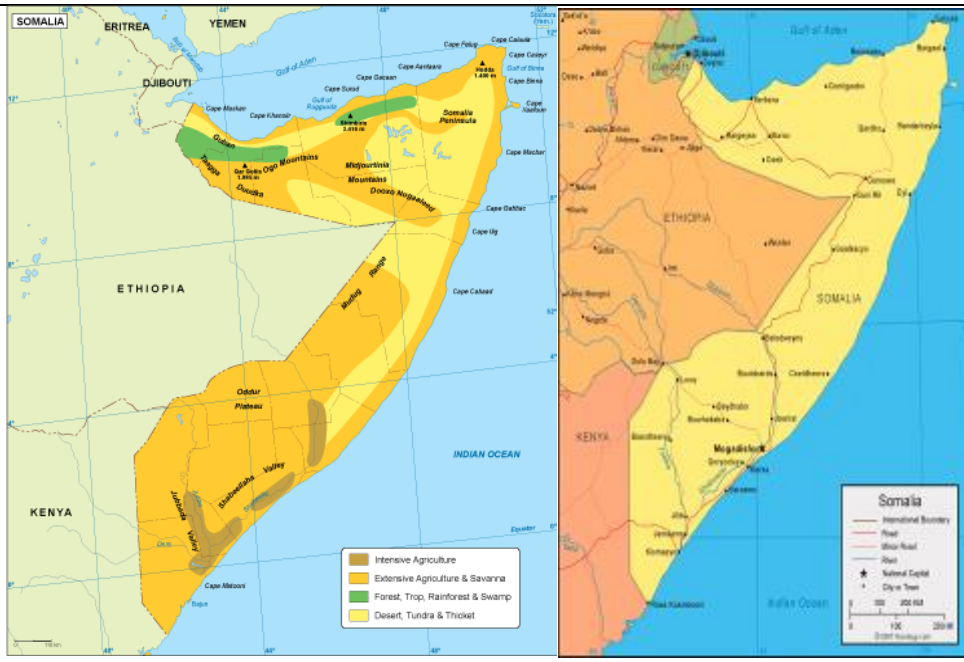
3.1.2 Climate Change

50. Climate is the primary determinant for Somali life. Over half of the populations are pastoralists where the timing and amount of rainfall are crucial factors determining the adequacy of grazing and the prospects of prosperity. Unfortunately, Somalia has been highly susceptible to the effects of climate change and extreme weather conditions, such as periods of extended drought, flash floods, erratic rainfall, disruption to the monsoon seasons, strong winds, cyclones, sandstorms and dust storms.[8] Recognizing the impact of climate risks on the country's future, in December 2009, Somalia became a signatory to the UN Framework Convention on Climate Change (UNFCCC). In 2013, it formulated its National Adaptation Programme of Action to Climate Change; in 2015, it became one of 165 countries that submitted its Intended Nationally Determined Contribution (INDC) action plan ahead of the Paris Summit, outlining proposed programs and interventions that would contribute to emissions reductions and the adaptation of its agricultural systems for improved climate resilience. Together, the National Adaptation Programme of Action to Climate Change and the INDC provide a road map to inform and guide technical and financial contributions from all stakeholders.[9]

[6] Williams and Funk 2011, pp. 2417–35.
[7] Anyah, and Semazzi, 2006, pp. 39–62.
[8] Ministry of National Resources 2013, p. 14.
[9] Somalia Country Economic Memorandum 2018.

51. Somalia has had a fair share of extreme weather events for the past 25 years.[10] The three states under discussion are heavily affected, with this type of weather, threatening food security in the respective areas.

52. The maps below (Figure 3-1 (a)) 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 (Figure 3-1 (b)) shows the transport network available in the southern region and the river system available.



(a) intensive agriculture (b) Transport System

Figure 3-1: Map showing intensive agriculture and transport system in the southern region

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

3.1.3 Biological Environment

Somalia's natural resources fall into two categories: marine resources such as fish and salt; surface resources which include forests and forest products such as the aromatic extracts of frankincense (from *Boswellia spp*.).

53. In the absence of a government, many traditional forms of natural resource management and control systems have been abandoned or are now ignored. In several instances, this has resulted in clearly unsustainable exploitation, a trend which may prove difficult to reverse.

[10] Food and Agriculture Organization of the United Nations (FAO) 2018.

54. Biodiversity and Protected Areas: Only 0.8% of the Somalis area is under some form of protection (2000). A National Conservation Strategy used to exist but is now extremely low on the territories' agenda. Somalia is part of Conservation International's Horn of Africa Hotspot which has over 60 endemic genera and over 2,750 endemic species. Somalia is a part of Somalia-Masai steppe geographic region of plant endemism (savannas and shrub lands) and has 24 important bird areas. Generally, fauna has been depleted due to hunting and culling to protect livestock. Invasive species (e.g., *Prosopis spp*. and the Indian House crow, *Corvus splendens*) have widespread effects on local fauna and flora and are important to address, although Prosopis could be used to substitute endemic trees for charcoal production**Error! Bookmark not defined.** (see Figure 3-2).

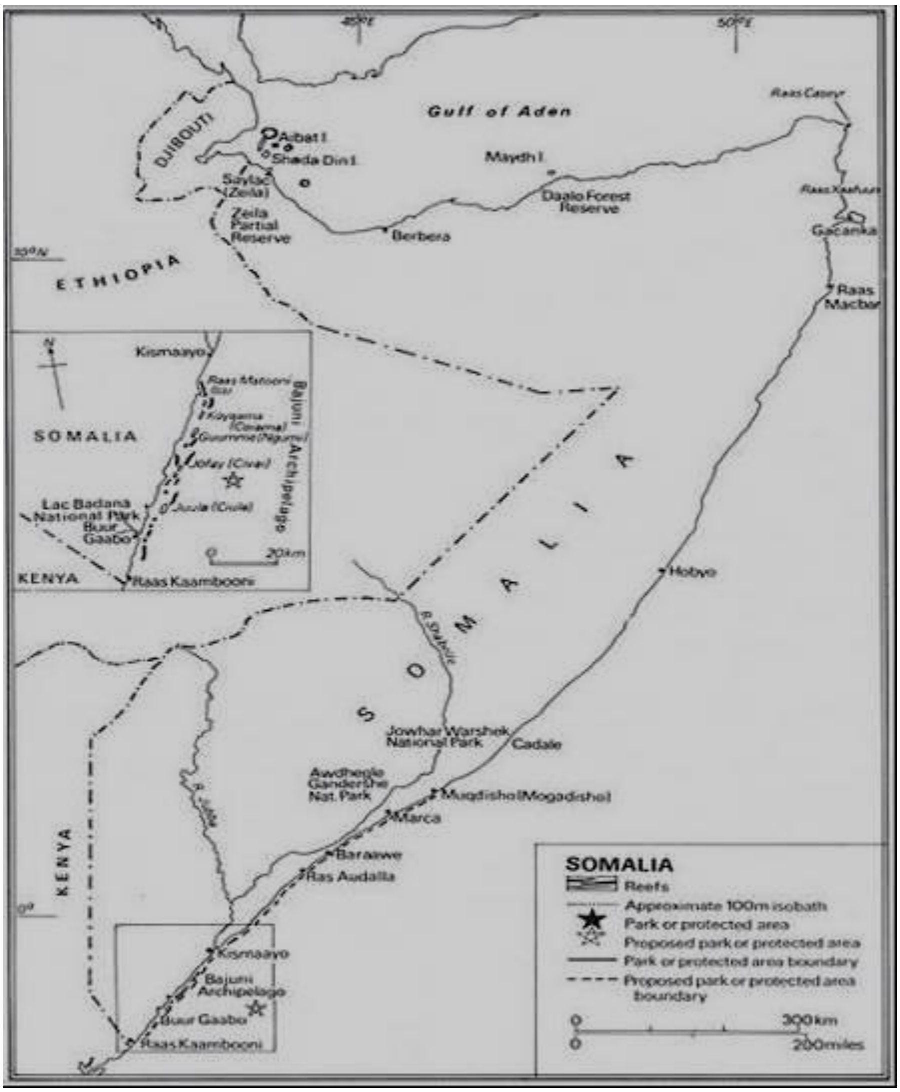


Figure 3-2: Map showing Somalia's ecological parks, coral reefs and protected areas

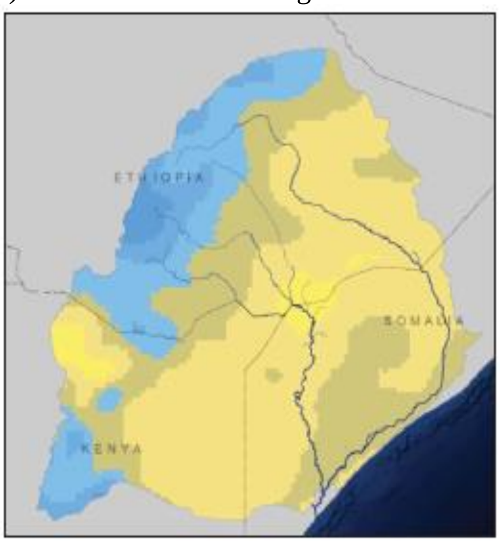
Source: https://en.wikipedia.org/wiki/List_of_national_parks_of_Somalia

55. Forests and Woodlands: The vegetation in Somalia is predominantly dry deciduous bushland and thicket dominated by species of Acacia and Commiphora, with semi-desert grasslands and deciduous shrub land in the north and along much of the coast. Forest growth in general is limited due to poor soils and low rainfall. Closed forest cover occupies only about 2.4 per cent of the country (IUCN, 1992) but, if the Juniperus forests and evergreen tracts in the mountains in the north are included, the total forest coverage would probably amount to around 14 per cent (90,000 km^2) of the land.

56. Land Degradation: Over the past two decades, land degradation, deforestation and desertification have rapidly accelerated; the Lower Juba area was estimated to have lost 50 per cent of its forest cover during the years between 1993 and 2014. Even with current temperatures, the flora in Somalia is strained to such an extent that it is often unable to rehabilitate itself.

3.1.4 Water Resources (Hydrology)

57. Somalia's two main rivers, the Juba and the Shabelle, generate fertile floodplains, sustain essential agriculture and crop production, and supply Mogadishu with water. Ethiopia, Kenya and Somalia share the Juba–Shabelle river basin, with Somalia being the lower riparian (see figure 3-5). Both rivers emerge in the Ethiopian highlands and are Somalia's only perennial rivers. Given the lack of rainfall in the downstream areas, these two rivers are highly dependent on precipitation in the Ethiopian highlands. The low rainfall downstream and also high evaporation and water withdrawal are reasons why both rivers lose runoff on their descent to the Indian Ocean (see figures 3-3 and 3-5). Increased dam-building activities in Ethiopia further affect the river system.



Note:

Rainfall levels are graded on a colour spectrum with yellow representing areas with low amounts of rainfall and blue representing areas with high amounts of rainfall.

Source: United Nations Environment Programme (UNEP), Africa Water Atlas (UNEP: Nairobi, 2010).

Figure 3-3: Juba–Shabelle river basin average annual rainfall

Note:

Runoff levels are graded on a color spectrum with red representing areas with low amounts of runoff and blue representing areas with high amounts of runoff.

Source: United Nations Environment Programme (UNEP), *Africa Water Atlas* (UNEP: Nairobi, 2010).

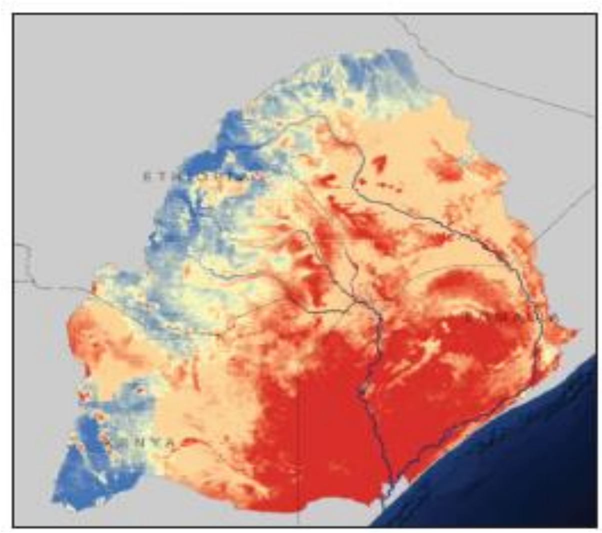


Figure 3-4: Juba–Shabelle river basin modelled available runoff

Map showing most pronounced rivers in the southern part of Somalia being Jubba and Shebelle Rivers.

Source: https://www.google.com/search?q=somalia+states+atlas+map

Figure 3-5: Map of Somalia showing Jubba and Shebelle River System

3.1.5 Water Scarcity

58. Generally, water scarcity is a persistent phenomenon in Somalia, even without drought. There are concerns about the rivers, which face overall decreasing volumes and have tended to temporarily dry up completely on several occasions. The country's water supply comes mainly from boreholes, shallow wells and berkads, and access to water and sanitation is very low. The majority of open wells, berkads and some shallow boreholes in Somalia are likely to be contaminated due to the common practice of open defecation and the absence of a system for controlling water quality. Water sources have been increasingly drying out as a result of the drought, and the scarcity of water has prompted abnormal migrations and increased the cost of potable water. The average distance to water points has increased to 50km, with some communities making a round trip of up to 125 km for water. The lack of water and competition for this scarce resource is also one of the triggers for conflict in Somalia. The drought has affected not only the quantity but also the quality of drinking water. There are noticeable weaknesses in the water sector related to water quality testing and monitoring in Somalia, which is compounded by the relatively poor understanding of how the water supplies become contaminated and the risks associated with the use of contaminated water.

59. The cost of water has increased by 50 percent during critical dry periods. In Gedo region in southern Somalia, Jubaland State, 90 percent of villages are now reliant on unsafe water sources for drinking and domestic purposes. Southwest State also usually experience acute water shortage due to lack of permanent source of water. Parts of the state that experience the shortage include, Buur Hakaba, rural Baidoa, Diinsoor, Qansaxdheere among others.

3.2 Socio-Economic Baseline

60. The socio-economic statistics for the project implementing areas has been documented in the social-economic survey undertaken by International Livestock Research Institute in. However, some details of socio-economic summary are provided below.

3.2.1 Livestock ownership

61. Both women and men mostly own and keep female goats (68% for women and 60% men) and male goats (20% for women and 15% men) (Figure 3-6). Ownership of camels and cattle was generally low and almost absent among women. However, a few men keep camels and female cattle. The main purpose for keeping livestock was subsistence (i.e., food). Households also kept livestock for breeding/reproduction purposes (Figure 3-7). Less than 10% of both women-and men-headed households reported selling as the main purpose for keeping livestock. This indicates a lower degree of commercialization and an opportunity for improved market participation.

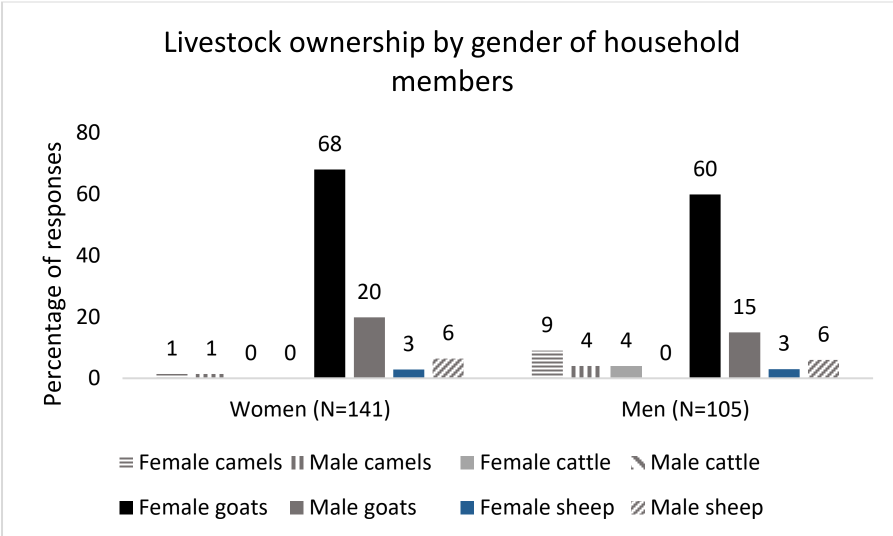


Figure 3-6: Ownership of livestock types by men and women household members in Somalia

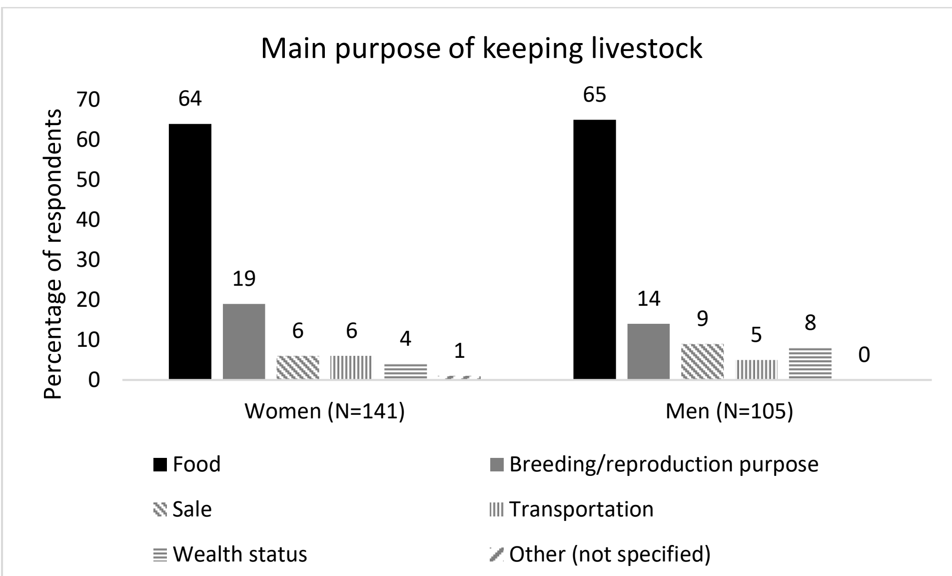


Figure 3-7: Main purpose of keeping livestock types in Somalia

3.2.2 Phone ownership

62. Most (98%) of the heads of households own a phone. There is no difference in ownership of phone between men and women household heads. In terms of features of the phone owned, results show that all phones have mobile money services. In addition, the study shows that more men than women have access to WhatsApp and Facebook. However, the survey probed for the gender of the persons whose names were registered for mobile money accounts, shows that more women (55%) than men (45%) have the mobile money accounts registered on their names.

3.2.3 Access to savings and credit

63. 41% of the respondents mentioned their households had cash savings while 11% were unsure (Figure 3-8). Disaggregated summary statistics by gender of the household head shows that more men (45%) than women (39%) headed households have cash savings (Figure 3-9).

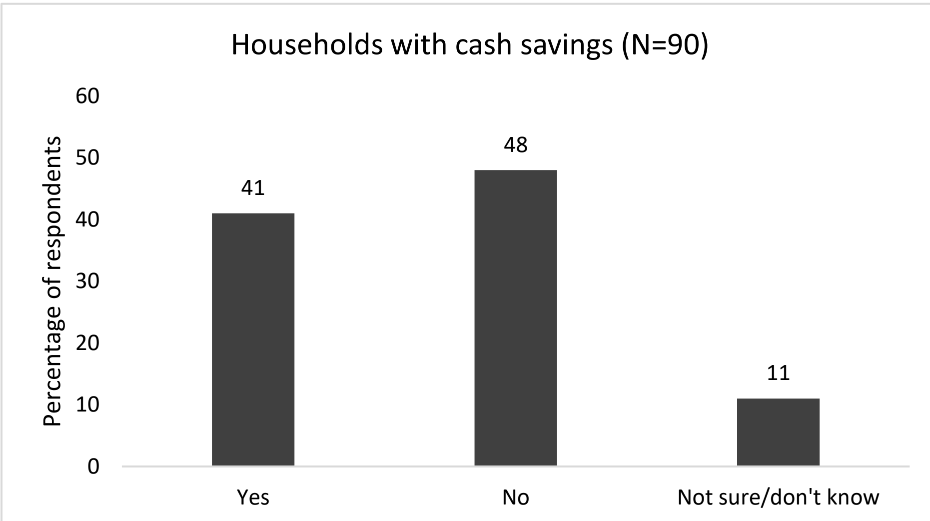


Figure 3-8: Percentage of households with cash savings in Somalia

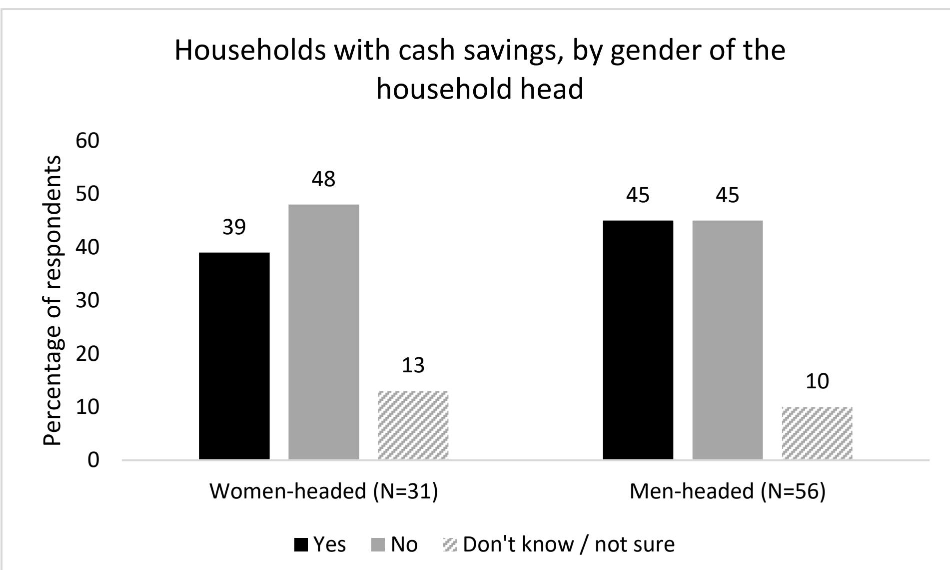


Figure 3-9: Ownership of cash savings among men and women-headed households in Somalia

64. Looking at the specific members of households with cash savings, disaggregated analysis by gender shows that more men than women have cash savings (Figure 3-10).

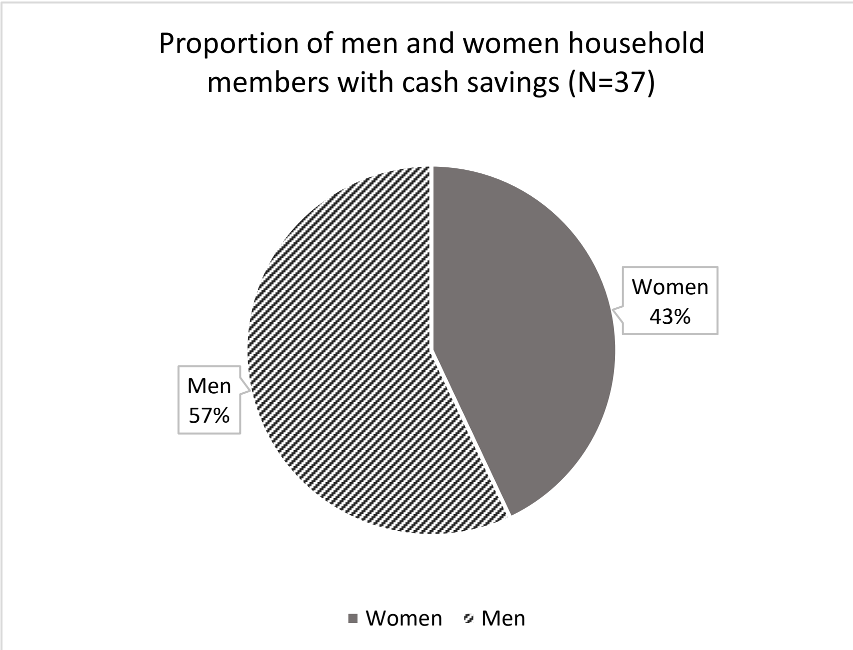


Figure 3-10: Ownership of cash savings among men and women household members in Somalia

65. When asked where they keep the largest part of their cash savings, most respondents reported mobile money as their main channel for saving cash (Figure 3-11). Results show that more women-headed than men-headed households save cash via a mobile money platform. This result is consistent with the earlier finding that more women than men have mobile money accounts registered on their names. However, the proportions of households saving in informal saving schemes and at home were higher for men-headed than women-headed households. Results also show that very few households (only 2%) have bank savings accounts (Figure 3-11).

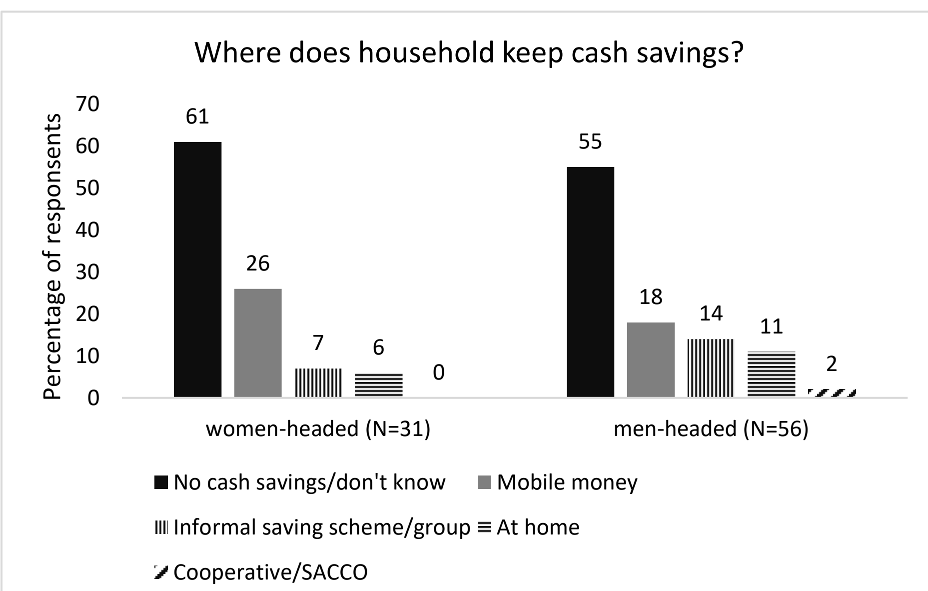


Figure 3-11: Where households keep cash savings in Somalia

Among reasons for not saving in a bank, SACCO, microfinance institution includes unavailability of banking services and lack of trust (Figure 3-12).

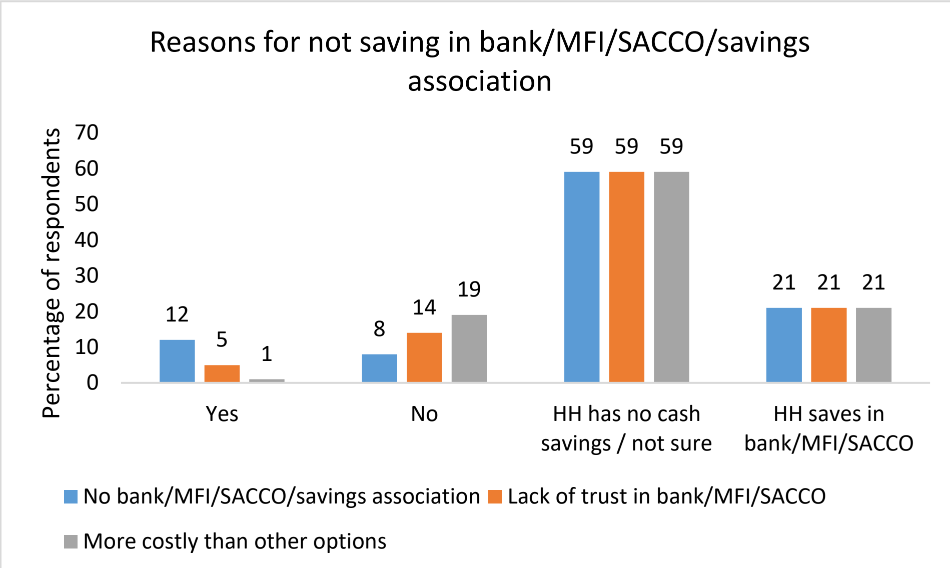


Figure 3-12: Reasons for not saving in bank or micro finance institute, or SACCO, or financial association in Somalia

66. More than one-fifth (22%) of the sample households borrowed money. There was no difference in the percentage of households borrowing money between men and women headed households. The main source of credit was relatives and friends. Women-headed households reported that the main reason for not borrowing were that credit is unavailable (36%) and that no one would lend them because they were not credit worthy (29%) (Figure 3-13). Men-headed households on the other hand reported that they did not need credit or prefer not to owe money (38%). 14% of the men-headed households reported that no one would lend to them because they were not credit worthy.

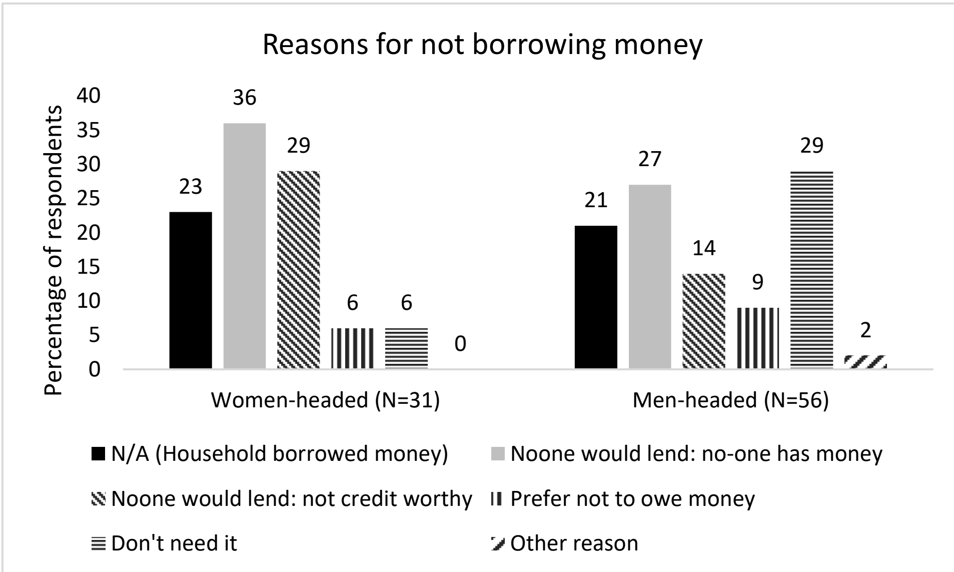


Figure 3-13: Reasons for households not borrowing money in Somalia

3.2.4 Insurance

67. The percentage of households aware about index-based livestock insurance was very low (6%) (Figure 3-14). Focusing on those household aware about IBLI, only 5 in the sample for Somalia (4 women-headed and 1 man-headed), 2 women were willing to pay for insurance for cattle, 3 women were willing to pay insurance for camel, and 2 women were willing to pay insurance for goat/sheep. The one man aware of IBLI was willing to pay livestock insurance for cattle, camel, and shoats. Two out of the 4 women aware of IBLI and the one man indicated willingness to make contributions to a savings account as part of payment for livestock insurance. They would also be willing to buy livestock insurance every year if offered for purchase. 24% of the households think members of their community would be interested to form a group to manage the purchase of livestock insurance on behalf of their community. Specifically, 23% of women-headed and 25% of men-headed households think members of their community would be interested to form a group to manage the purchase of livestock insurance on behalf of their community (Figure 3-15).

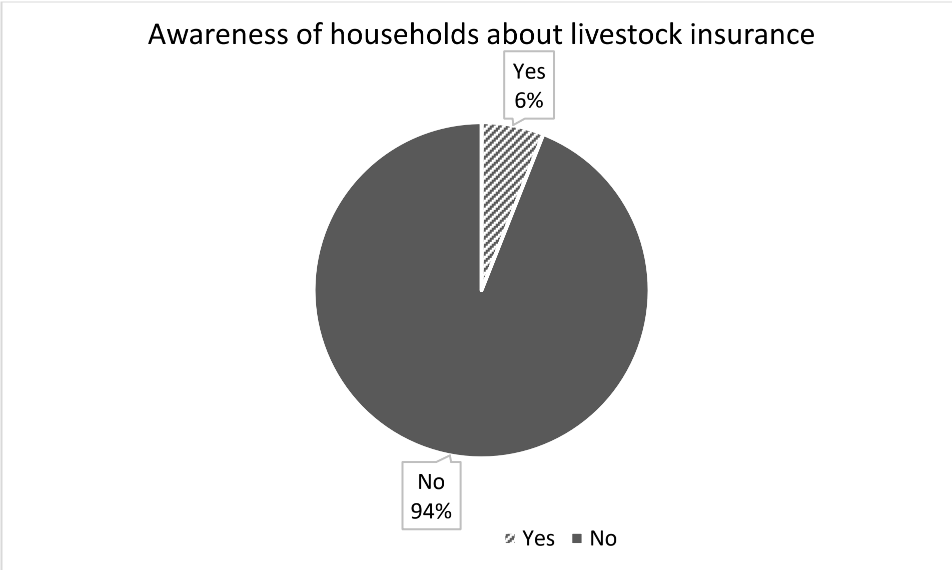


Figure 3-14: Percentage of households aware about index-based livestock insurance in Somalia

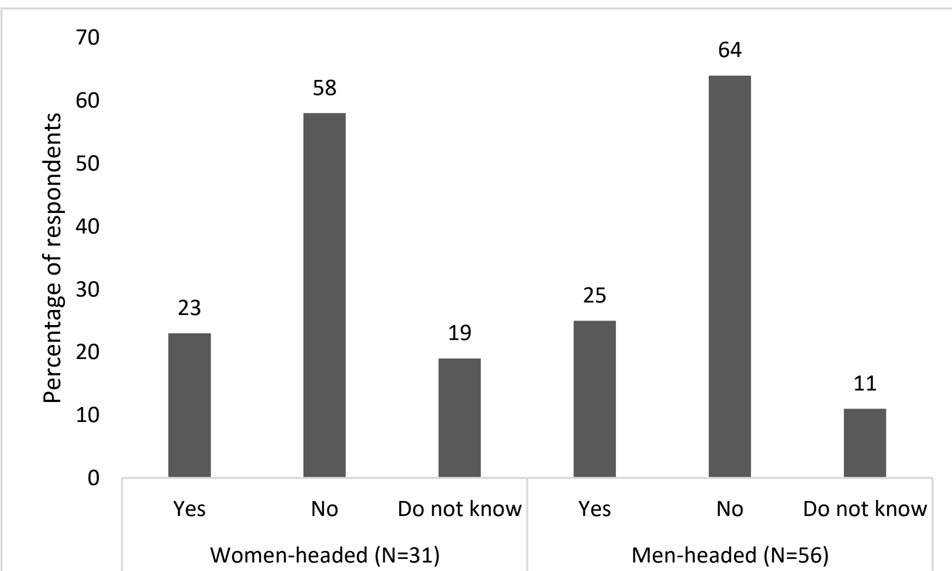


Figure 3-15: Percentage of households indicating members of their community would be interested to form a group to manage the purchase of livestock insurance on behalf of their community

3.2.5 Agriculture

68. Somalia has a total area of about 137,600 sq. kms. Land under cultivation is currently estimated at 3 per cent of the total geographical area. Another 7 per cent has potential for agricultural development. The rainfall, soil (fertility and depth), and topography are the main determinants of these estimates. The agricultural system in Somalia is predominantly subsistence in nature. The principal crops are sorghum and maize grown mostly for household consumption. Fruit and horticultural farming, which is relatively small, is mainly commercial. Here, farmers grow mainly tomatoes, lettuce, onions, peppers, cabbages, oranges, lemons, and papaya. Rain-fed farming accounts for 90 per cent of the total area cultivated, while the area under irrigation constitutes only 10 per cent.

69. The sector is dominated by smallholder farmers who tend small farms ranging from 2 to 30 hectares in area. The size of the average farm is approximately 4 hectares. Somaliland's agriculture was practically destroyed during the civil war from 1982 to 1991 – agricultural equipment and farmers' property were looted, and infrastructure was devastated. The majority of the farmers fled as refugees to neighboring countries and returned home only when the conflict ended. Although some recovery has been made in the past 20 years, a lot more remains to be done.

70. During the war, the institutional capacity of the Ministry of Agriculture (MoA) was eroded severely because of the brain drain resulting from the migration of professionals to other countries, looting of assets, and the destruction of Ministry's facilities. The reduced capacity of the agricultural sector to produce food for the nation is clearly demonstrated by the total cultivated area under Sorghum and maize, the two main crops, which in 2009 was less than 23,000 hectares, and average yields were only 0.5 tons per hectare.[11]

71. Rain fed Farming and Irrigation: Rain-fed farming is the main agricultural production system. The main crops grown are cereals. Sorghum is the principal crop, utilizing approximately 70 per cent of the rain-fed agricultural land. Another 25 per cent of the land is used for maize. Other crops such as cowpeas, millet, groundnuts, beans, and barley are also grown in scattered marginal lands. Irrigation farms are mainly situated along the banks of streams (togs) and other water sources close to the riverbanks. Channeling from the source to the farm is mainly done by diversion of perennial water (springs) to the farm through rudimentary earth canals or floods. The cultivable area of these farms is subject to floods and is, therefore, in danger of being washed away. Most of the irrigated farms have in them areas set aside for the cultivation of vegetables and fruits for commercial purposes.

72. Livestock: There are several types of livestock production and management systems in Somalia, depending on a number of factors such as the area, availability of labor, and the sizes and types of livestock raised. However, in general, there are two main production systems: one based on nomadic pastoralism and the other on agro-pastoralism. Nomadic pastoralism is the system practiced by most of the rural population and revolves around the seasonal migration of herders in continual search of pasture and water.

73. The movement of these pastoralists is often organized and follows a regular pattern in which clan-based groupings have their traditional grazing areas and/or common watering points and temporary camps. In some parts of the country, pastoralists co-habit with farmers to access crop residues for their animals. In other places, the pastoralists take advantage of heavy rains and floods for agricultural purposes, planting crops in areas cleared for the production of forage or grain.

74. Related to the above, relatively high rainfall in the highlands around Hargeisa has raised the organic content in the sandy calcareous soils characteristic of the northern plains, allowing some dry farming to be practiced. South of Hargeisa begins the Haud, which red calcareous soils continue into the Ethiopian Ogaden. This soil supports vegetation ideal for camel grazing. To the east of the Haud is the Mudug plain, leading to the Indian Ocean coast; this region, too, supports a pastoral economy. The area between the Jubba and Shabelle rivers has soils varying from reddish to dark clays, with some alluvial deposits and fine black soil. This is the area of plantation agriculture and subsistence agro-pastoralism.[12]

75. The livestock and crops sector are the main sources of economic activity, employment and export. 49 per cent of the population lives in rural areas, and 46 per cent of all employed people work in agriculture (crop cultivation, herding, fishing). However, while the livestock is an important sector, there are still minimal governmental animal health programs and institutions regulating and controlling it.[13]In addition, the poor state of waters and transport infrastructures has kept the agricultural sector from recovering and becoming resilient.[14]

76. Somalia is prone to suffer from flooding. Most of the flooding in 2019 occurred in Middle and Lower Juba, Bay, Lower and Middle Shabelle, and Hiraan. Weeks of flooding have destroyed physical, productive, and social service delivery infrastructure. Physical infrastructure, such as roads were turned into rivers, and agricultural land was fully destroyed, and livestock was lost.

77. According to FAO, since 2016, Somalia has faced climate shocks for eight agricultural seasons. 2.1 million people currently live in severe acute food insecurity; and 1 million children are acutely malnourished.[15]

78. Livelihoods are threatened by natural disasters, epidemics, and issues such as injury, death or unemployment. For example, climate conditions and the drought of 2016/17 had significant impacts on livelihoods. Shocks at the household level are experienced through drought impacts, including through loss of crops and livestock and shortage of water for farming or cattle; or high food prices.[16]

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[12] Somali Core Economic Institutions and Opportunities Program ESMF, 2017.

[13] Government of the Federal Republic of Somalia and The World Bank 2020, p.21.

[14] Government of the Federal Republic of Somalia and The World Bank 2020, p.22.

[15] UNFAO, Somalia Humanitarian Response Plan 2020, accessed at: http://www.fao.org/3/ca7825en/CA7825EN.pdf

[16] Government of the Federal Republic of Somalia and The World Bank 2020, p.19.

3.2.6 Labor and Employment

79. In the labor sector, 47 per cent of the population in South Central Somalia is unemployed. Among youth the rate is even higher with 54 per cent.[17] The main employment is in the agricultural sector, where 72 per cent of employees worked in 2019; followed by 6 per cent in the industrial sector, and 21 per cent in the service industry.[18]

80. In addition, as ILO points out, the legal and judicial systems governing employment are still weak; and there are few private or public insurance institutions; nor are there labor inspection systems in place. It reminds that workers can be exposed to hazardous work without adequate protection, and child labor is a common practice in Somalia.[19]

3.2.7 Security and Conflict Environment

81. Somalia ranks second on the Fragile State Index from 2019 with a total score of 112.3. Somalia's indicators on factionalized elites and demographic pressures are the highest. Somalia has had a long history of clan-based civil war and remains trapped in continued fragility, which is protracted by insecurity, fledgling government capacity, predatory armed groups and spoiler networks. These challenges pose significant security risks for the population, but also for project activities. These include terrorist attacks, hijackings, abductions, and killings. The past two decades have been dominated by terrorist attacks, political infighting and clan-related tensions, which goes back into history and historical movements and power distribution including during the establishment of the FMS. This has worsened the security situation in Somalia significantly.

82. Access to water and pasture is a fundamental source of both conflict and cooperation between clans and civil authorities throughout the Somali region. In terms of conflict, extensive trans-boundary movements of livestock and limited access to the combination of water and pasture is one of the primary drivers of conflict across the Horn of Africa and within Somalia. Long and well documented records of conflict and cooperation over access to water and pasture in pastoralism domain exists (Gomes 2006). Following decades of low investment in Somaliland and Puntland, water points with adequate surrounding pasture are especially scarce, claimed by clans, fiercely guarded and intrinsically linked to resource conflict. A security risk management plan for the DRIVE activities is provided in annex IX. The SMP will be updated to provide specific details on security arrangements and the preparation of site specific SMPs within three months of effectiveness.

[17] Federal Government of Somalia, Ministry of Education, Culture and Higher Education, Education Sector Strategic Plan 2018-2020, p.13

[18] Statista, Somalia: Distribution of Employment in by economic sector from 2009 – 2019, accessed at: https://www.statista.com/statistics/863133/employment-by-economic-sector-in-somalia/

[19] ILO, Decent Work Programme, Somalia 2011-2015, p. 12.

4 Potential Environmental and Social Impacts and Mitigation Measures

4.1 Introduction

83. This chapter identifies the generic potential environmental and social risks and impacts associated with the implementation of the DRIVE and proffers mitigation measures in line with the mitigation hierarchy provided in the ESF. The objective of this section is to aid the PIU and other institutions responsible for implementing this ESMF to identify, evaluate and manage the environmental and social risks and impacts of the project and consequent activities in a manner consistent with the applicable ESSs. The impact identification and assessment are based on potential impacts from anticipated project activities. Site specific project impacts would be detailed for each sub project environment and social assessment, before the commencement of activities as part of the Environmental and Social Management Plan (ESMP) implementation to be prepared by the PIU through procurement of professional environmental and social safeguards services from qualified and experienced Consultants.

84. Component 1 will support the provision of an integrated package of financial services to build the climate resilience of pastoralists that will include: (i) savings for resilience, (ii) drought index-insurance, (iii) digital accounts and (iv) financial education and awareness creation. Component 2 activities will mostly be financial support and technical assistance. Management of social and environmental risks under component 2 will covered under the Terms of Reference for the Technical Assistance activities that will lead to the preparation of an Environmental Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP).

85. An ESMS has been prepared for Component 1 activities implemented by ZEP-Re.

86. Based on stakeholder consultations and the fact that the project is centered on improving the livelihood of the vulnerable and supporting the capacity of the government institutions, it is envisaged that the project will have minor negative environmental impacts. The potential positive socio-economic benefits that may be registered as a result of this project are well described in this ESMF, which has been prepared in accordance with the procedures set in place by the World Bank;

87. An Environmental and Social Commitment Plan (ESCP) has been prepared for the project. The ESCP requires compliance with all provisions of the following environmental and social instruments, which have been prepared and/or are under preparation for this project: The ESCP also requires compliance with ESIAs and ESMPs, SEP, and LMP, which have been prepared under this project.

88. The Stakeholder Engagement Plan (SEP) has been developed. The SEP includes stakeholder identification and analysis summary, plans for engagement (e.g., type, regularity, etc.), communication activities and grievance redress mechanisms. The SEP outlines both the initial and ongoing process by which stakeholders will be engaged to ensure the design of the project aligns with stakeholders current and ongoing needs. Consultations have been done on the SEP with a variety of actors in the livestock sector in Somalia, and a number of comments received and addressed.

89. The Labour Management Procedures (LMP) is annexed to this ESMF (Annex V) and will be cleared before effectiveness. The LMP outlines requirements for working conditions for both government and private entities under seed capital subcomponent, primary suppliers including a mechanism to prevent child and forced labour and reporting requirements on serious incidents.

90. A GBV Prevention and Protection Action Plan has been developed to address risks related to sexual exploitation abuse and harassment.

91. The potential positive impacts associated with the project include but not limited to:

4.1.1 Upgrading quality infrastructure

92. The project would support capacity building and equipment to ensure compliance of livestock and livestock products with export standards. Quality infrastructure refers to testing facilities, traceability systems, certification services, inspection services and quarantine systems. It is critical to enable formal trade and enhance the quality of livestock and livestock products, to export higher value processed products (meat).

4.1.2 Protection of pastoralists against recurring drought shocks

93. A package of financial services and risk transfer (such as drought insurance) will protect pastoralists against recurring drought shocks. The project will support behavioural changes amongst pastoralists to seek regular sales of younger livestock through off-take agreements with livestock traders and processors, and to improve the quality of the livestock sold. Regular sales will protect the carrying capacity of the rangelands against degradation, and aggregation will help enforce grazing rules and prevent the "tragedy of the commons". Organized pastoralist groups with regular livestock sales and protection against drought will be more attractive to credit institutions, and access to credit will enhance productivity. The project will upgrade the livestock value chain with better quality infrastructure to "move up" the chain from live animals to livestock products, and with trade facilitation and improved logistics. To ensure the sustainability of the intervention, the project aims to mobilize private investment into the livestock value chain that will create reliable links of pastoralists to markets.

4.1.3 Strengthening the resilience of pastoralists

94. The project will complement various interventions to strengthen the resilience of pastoralists including but not limited to: interventions that enhance the provision of water, fodder and animal health services in pastoral areas, increase the awareness to shocks with early warning systems, support better rangeland management and business development services to pastoralist groups.

4.1.4 Regional interventions to benefit from economies of scale

95. The project is designed as a regional intervention to benefit from economies of scale, specialization, and to support trade, so that countries gain higher value than each acting alone. De-risking pastoralists with financial services and risk transfer such as drought insurance, requires scale, technical capacity, and engagement with international markets to place the risk. Setting up a single platform of services will lower the operational and premium costs, as well as acting as a public good allowing other countries to join when ready. Quality infrastructure requires costly investments into equipment (laboratories) and skills, and for a country like Somalia which is at an early stage it makes sense to leverage on neighbouring countries' capacity. Regional collaboration also supports harmonization of standards and move towards formal trade among the participating countries. All HoA countries are exporting livestock to the same countries in the Middle East and have an interest in addressing non-tariffs barriers collectively.

4.1.5 Private Capital Mobilization (PCM) agenda

96. The project contributes to the Private Capital Mobilization (PCM) agenda. Component 1 will transfer pastoralists' drought risk to the insurance market and mobilize the capital of private (re)insurance companies (local and international) on the total sum insured. It will also mobilize savings from pastoralists themselves that could be invested in other types of business, thus achieving income diversification and increasing their access to credit. The project will look to quantify the additional private capital mobilized beyond the sum insured through project evaluations. Component 2 will aim to mobilize private capital in the regional livestock value chains from private firms, by providing seed capital to private investment when such investment makes commercial sense but is inherently risky given the target groups it seeks to benefit (pastoralists and agro-pastoralists).

97. Finally, the project complements the IFC HoA Livestock Sector Approach. IFC has developed a regional strategy for the HoA to create markets for livestock and livestock products, with a focus on red meat. The Bank and IFC teams are collaborating on several initiatives under this project, using ongoing IFC advisory activities or investments to inform the public investments or financial support required to mobilize private capital into the livestock value chains.

98. The project supports the Green, Resilient and Inclusive Recovery (GRID) approach which urges that poverty and climate change are interrelated and need to be addressed simultaneously and systematically. Instead of relying on humanitarian assistance which arrives too late, pastoralists would receive insurance payouts at the onset of drought by use of the digital and satellite technology allowing them to purchase supplies to keep their animals alive or draw on their savings facilitated under the project for smaller shocks. This will help pastoralists adapt to climate change which brings increased climatic uncertainty. The entire Component 1 is expected to generate adaptation climate Co-Benefits. Also, as livestock can be an important contributor to greenhouse gas (GHG) emissions, Component 2 will facilitate private investment into the livestock value chains with a facility to de-risk those investments and one bidding criterion will be climate adaptation or mitigation benefits. Through both components, pastoralists would be able to extract more value from their livestock, have access to reliable markets, reducing the need to maintain large herds, and the associated risk of overgrazing.

4.2 Potential Adverse Environmental and Social Impacts

99. Potential Positive Environmental and Social Impacts. While the project's overall risk rating is substantial for both environmental and social risks. The environmental and social risks for Component 2 are considered moderate since there will be no civil works and this component will focus on Technical Assistance activities.

100. Component 1 which will be implemented by ZEP Re, has relatively limited direct impacts and is not expected to have significant indirect and induced adverse environmental impacts on human populations and/or the biophysical environment. Pastoralists would use insurance pay-outs to provide for their livestock during the early stages of drought, reducing the need for movement and tensions between pastoral communities. This is expected to reduce stress on scarce resources, reduce cross-border competition for scarce natural resources enhance resilience and decrease the risk of conflict during droughts when pastoralists cross borders.

101. Component 2 is mostly technical assistance. For this, Terms of Reference for the feasibility studies will ensure that relevant environmental and social issues are considered in conducting the studies in a manner that is consistent with the ESF, including reference to the relevant provisions of the Environmental and Social Standards. The main environmental and social risks related to this component is mainly Occupational, Health and Safety (OHS), overgrazing, groundwater and potable water source pollution, further marginalization of vulnerable groups, elite capture and sexual exploitation and abuse/sexual harassment risks.

102. When Component 1 and 2 activities are implemented, these activities will, directly and indirectly, pressure local resources and generate impacts that may result in habitat degradation or fragmentation, limited clearance of vegetation cover, pollution of groundwater and surface water resources, generation of air pollutants, noise, dust, risks to community health and safety, risks to workers' occupational health and safety, and overgrazing. Negative social risks will also include further marginalization and lack of inclusion of the very vulnerable and minority pastoralists; due to the nomadic nature of pastoralists, limited outreach, and meaningful consultations with the pastoralist communities; since not all pastoralist households will own a mobile phone plus some pastoralist areas have poor mobile connectivity that hinders access to these services.

103. Many of the potential adverse environmental and social impacts of DRIVE activities are envisaged to be localized to some extent in spatial extent, short in duration and can be managed through the implementation of appropriate mitigation measures for example dust emission, among others. However, some of the potential impacts and risks particularly related to pollution, Waste management, Wastewater, air emissions, generation of hazardous materials, ecological impacts and animal diseases could be significant long term and/or permanent including risks related to GBV. This ESMF includes a negative list of the environmental and social screening form (See Annex I) as well as potential impacts and risks of physical interventions which will help in identification of such impacts and risks to ensure that potential adverse impacts and risks are prevented and/or mitigated appropriately, and positive impacts are enhanced. Aside from the above-mentioned risks and impacts, insecurity, community concerns about project activities and capacity constraints remain key challenges in the livestock sector in Somalia.

104. The mitigation measures outlined below are not intended to be exhaustive in content but rather to indicate in general the scope of ESIAs and ESMPs. It is entirely possible that additional impacts will be identified during impact assessment studies or audit preparation and will require additional mitigation measures. In the ESIAs and ESMPs, impacts shall be categorized according to project phases.

4.2.1 Generation of Solid Wastes

105. Solid waste generated during mammalian livestock production includes waste feed, animal waste, and carcasses. Other wastes include various kinds of packaging (e.g. for feed and pesticides), used ventilation filters, unused / spoilt medications, used cleaning materials, and sludges from wastewater treatment if present (which may contain residual amounts of growth enhancers and antibiotics, among other hazardous constituents). In addition to the following sector specific guidance, wastes should be managed and disposed of according to the guidance for hazardous and non-hazardous waste provided in the General EHS Guidelines.

106. Waste Feed: Livestock feed includes hay, grain (sometimes supplemented with protein, amino acids, enzymes, vitamins, mineral supplements, hormones, heavy metals, and antibiotics), and silage. Livestock operations may produce all, a portion, or none of the feed used. Feeding can take place in buildings, feedlots, and pastureland. Feed can become unusable waste material if spilled during storage, loading, and unloading or during animal feeding. Waste feed, including additives, may contribute to the contamination of storm water runoff, primarily because of its organic matter content.

107. To maximize the efficiency of the operation and minimize wasted feed, the following measures are recommended:

- Promote efficient storage, handling and use of feed by maintaining records of feed purchases and livestock feed use;
- Use covered or protected feeders to prevent feed from exposure to rain and wind;
- Maintain feeding systems in good working condition to prevent spills and feed contact with the ground;
- Consider mixing of waste feed with other recyclable materials destined for use as fertilizer, or else consider incineration or land disposal options, based on an assessment of potential impacts of each option to air, soils, and surface water / groundwater.

4.2.2 Pressure on local resource use

108. The livestock value chains and trade facilitation component of the project will cause a significant use of local resources, particularly water and energy. Export-based animal fattening and milk production necessarily depend up on the use of large amount of fresh water for feeding and cleaning of enclosure. The activities of upgrading quality infrastructure such as the establishment of testing labs will depend on the use of electric power. The potential pressure of the activities of the livestock value chains such as processing industries on local resource is even more. That is because, the operation of the livestock processing industries necessitates the intensive use of water as well as energy. Given the critical shortage of water and energy supply in the target areas, thus, the project has significant potential cumulative and incremental impacts on the need and use of these resources by the project-affected communities.

Mitigation Measures

- Exploit underground water rather than competing for the scare fresh/tap water.
- Hydrogeological studies may be required for groundwater abstraction,
- Applying inexpensive water conservation strategies such as avoiding wastage of water, and water recycling or reuse (e.g. treating and reuse of waste water).
- Storm/rainwater harvesting and use. Despite shortage of rain in the project areas, those enterprises or private investors engaged in large-scale livestock production could use large reservoirs to store water from storm/rainwater harvesting.
- Applying energy saving technologies and equipment in running the project activities under upgrading quality infrastructure.

- Regular comparison and monitoring of energy flows with performance targets to identify where action should be taken to reduce energy use. Preparation of mass and energy balance accordingly.
- Devising strategies for energy conversion system efficiency improvements. For example, a meat packing or diary industry could save energy by minimizing the number of machine to meet loads. Like it is typically more efficient to run one machine at 90% of capacity than two at 45%.

4.2.3 Greenhouse Gas (GHG) emissions

109. The DRIVE project involves investment in large-scale or export market-based livestock production. This may lead to significant Greenhouse Gas (GHG) emissions. This is mainly due to methane and nitrous oxide emissions, two particularly potent GHGs, predominantly linked with enteric fermentation and animal manure. Other project-related activities that may have potentially significant emissions of greenhouse gases include the transportation facilities, large-scale fodder plantation, deforestation due to project-related land acquisition or land use practice, and waste generated from different activities. Likewise, the GHGs may be generated from direct emissions from project-related facilities within the physical project boundary and indirect emissions associated with the off-site production of power used by the project.

Mitigation Measures

- Develop biogas technology to use the animal manure for energy generation. Applying such technology has other benefits in addition to reducing GHG emissions. It provides an alternative source of energy for those private investors engaging in large-scale livestock production and thereby reduced pressure on local energy supply. Also, the residue from biogas energy production can be as a natural fertilizer.

- Promoting palatable fodder production. This could reduce the amount of manure generated per head of the cattle. Besides reducing the GHG emission palatable fodder is highly efficient in fattening the animals and contributes to the quality of meat.

- The supports Green, Resilient and Inclusive Recovery (GRID). The risk finance component of the project will leverage digital and satellite technology to help pastoralists adapt to climate change which brings increased climatic uncertainty. The entire Component 1 of the project is expected to generate adaptation climate Co-Benefits that simultaneously address the issues of economy and environment.

- Use of technologies and strategies that could avoid or reduce GHG emissions. Examples of such technology or strategy include carbon capture and storage technologies, protection and enhancement and increased use of renewable forms of energy, and protection and enhancement of sinks and reservoirs of greenhouse gases.

- Limitation and/or reduction of methane emissions through recovery and use in waste management.

4.2.4 Generation of Wastewater

110. Large-scale or commercial-based livestock production system in the project will generate a large volume of animal wastes. In relation to this, the improper management of livestock wastes (manure) can cause significant surface and groundwater pollution. Water pollution from animal production systems in the project can be by direct discharge, runoff, and/or seepage of pollutants into surface or ground water. Effluents have the potential to contaminate surface water and groundwater with nutrients, ammonia, sediment, pesticides, pathogens and feed additives. In addition, effluents from livestock operations typically have a high content of organic material and consequently a high biochemical oxygen demand (BOD) and chemical oxygen demand (COD), as well as nutrients and suspended solids (TSS).

Mitigation Measures

- Putting in place proper manure management which include several ways including avoid direct discharge and avoid open land discharge through developing proper septic storage and applying biogas production technologies. The volume of livestock manure generation can be reduced through improving animal feeding system (e.g., using palatable feeds).
- Reduce water use and spills from animal watering by preventing overflow of watering devices and using calibrated, well-maintained self-watering devices.
- Install vegetative filters to trap sediment.
- Install surface water diversions to direct clean runoff around areas containing waste.
- Implement buffer zones to surface water bodies, avoiding land spreading of manure within these areas; this can be done by maintaining grass buffer strips between surface waters, pasture and cropland.
- Reduce leachate from silage by allowing plant material to wilt in the field for 24 hours, varying cutting and harvesting times, and adding moisture-absorbent material as the silage is stored.

4.2.5 Air Emissions / Odours

111. Livestock production may be the source of wide-ranging environmental risks and impacts contributing to air pollution. Large-scale livestock production means animals are raised in confinement. Air emissions from mammalian livestock production include ammonia (e.g., management of animal waste), methane and nitrous oxide (e.g., animal feeding and waste management), odors (e.g., animal housing and waste management), bioaerosols, and dust (e.g., feed storage, loading, and unloading, feeding, and waste management activities).

Recommended measures to reduce impacts of ammonia and odors include the following:

- All of the mitigation measures listed for water pollution work for air pollution as well.
- Emissions from the project activities or facilities do not result in pollutant concentrations that reach or exceed relevant ambient quality guidelines and standards by applying national legislated standards, or in their absence, the current WHO Air Quality Guidelines.
- Regular maintenance of equipment that generates air pollutants, air emission levels following relevant WBG EHS Guideline.
- Consider siting of new facilities taking into account distances to neighbours and the propagation of odors.
- Control the temperature, humidity, and other environmental factors of manure storage to reduce emissions.
- Consider composting of manure to reduce odor emissions.
- Reduce emissions and odors during land application activities by applying a few centimeters below the soil surface and by selecting favorable weather conditions (e.g., wind blowing away from inhabited areas).

4.2.6 Animal Carcasses

112. Animal carcasses should be properly managed and quickly disposed of in order to prevent the spread of disease and odours, and to avoid the attraction of vectors. Operators should implement carcass management and disposal arrangements such that animal carcasses are not recycled into animal feed. Recommended carcass management practices include:

- Reduce mortalities through proper animal care and disease prevention.
- Store carcasses until collection, using cooling if necessary to prevent putrefaction.
- Use a reliable collection company approved by local authorities that disposes of carcasses by rendering or incineration, depending on the cause of fatality. Incineration should only be conducted in permitted facilities operating under international recognized standards for pollution prevention and control.
- Where no authorized collection of carcasses is available, on-site burial may be one of the only viable alternatives, if allowed by the competent authorities.

4.2.7 Emission of Dust

113. Dust emission from the animal feeds or as a result of the herd of cattle moving from one pastureland to another. Dust can reduce visibility, cause respiratory problems, and facilitate the transport of odors and diseases. Recommended measures to reduce dust generation include the following:

- Install dust-collection systems at dusty operations, such as feed grinding.
- Prevent overgrazing of pastureland.
- Implement fugitive-dust-control measures, such as wetting frequently travelled dirt roads, as necessary.

4.2.8 Generation of Hazardous Materials

114. Hazardous materials are used throughout the beef and milk production cycles (e.g., disinfecting agents, antibiotic and hormonal products). Pesticides may be applied directly to livestock or to structures (e.g., barns and housing units) and to control pests (e.g., parasites and vectors) using dipping vats, sprayers, and foggers. Pesticides can also be used to control predators. The potential pollutants from pesticides include the active and inert ingredients, diluents, and persistent degradation products. Pesticides and their degradation products may enter groundwater and surface water in solution, in emulsion, or bound to soil particles. Pesticides may, in some instances, impair the uses of surface waters and groundwater. Some pesticides are suspected or known to cause chronic or acute health hazards for humans as well as adverse ecological impacts. Pesticides should be managed to avoid their migration into off-site land or water environments by establishing and the use of alternative non-chemical pest management techniques (biological controls, Cultural and crop or livestock management controls, genetically based controls) over chemicals.

Mitigation Measures

- The use of pesticides in the project should be allowed only if they will have negligible adverse human health effects; they will be shown to be effective against the target species; and they will have minimal effect on non-target species and the natural environment.
- Screen pesticides: the use of any pesticide should be based on an assessment of the nature and degree of associated risks, taking into account the intended users.
- If pesticides are applied for whatever activities of the project, training should be given for personnel handling and applying pesticides.
- The use of formulated pesticide products that meet the criteria of carcinogenicity, mutagenicity or reproductive toxicity as set forth in the GPMP of the project. by relevant international agencies

(e.g. FAO) should be avoided.

- Exclusion of Production or trade-in pesticides/herbicides subject to international phase-outs or bans.
- Project beneficiaries in need must ensure that all pesticides used are manufactured, formulated, packaged, labeled, handled, stored, disposed of, and applied according to relevant international standards. The MoF will monitor the case.
- In the procurement of any pesticide for use in the DRIVE project, the MoF will assess the nature and degree of associated risks, taking into account the proposed use and the intended users.
- The use of any pesticide should be based on an assessment of the nature and degree of associated risks, taking into account the intended users.
- Appropriate storage facilities, protective gear and materials for storekeepers to handle emergencies and Material Safety Data Sheets (product information with emergency instructions).
-

Good Management Practices

115. If the application of pesticides is warranted, spill prevention and control measures consistent with the recommendations applicable to pesticides and other potential hazardous materials

116. In addition, the following actions specific to mammalian livestock production should be taken to reduce environmental impacts:

- Train personnel to apply pesticides according to planned procedures, while using the necessary protective clothing. Where feasible or required, pesticide application personnel should be certified for this purpose.
- Review the manufacturer's instructions on the maximum recommended dosage and treatment, as well as published experiences on the reduced rate of pesticide applications without loss of effect, and apply the minimum effective dose.
- Avoid the use of pesticides that fall under the World Health Organization Recommended Classification of Pesticides by Hazard Classes 1a and 1b.
- Avoid the use of pesticides that fall under the World Health Organization Recommended Classification of Pesticides by Hazard Class II if the project host country lacks restrictions on distribution and use of these chemicals, or if they are likely to be accessible to personnel without proper training, equipment, and facilities to handle, store, apply, and dispose of these products properly.
- Avoid the use of pesticides listed in annexes A and B of the Stockholm Convention, except under the conditions noted in the convention.
- Use only pesticides that are manufactured under license and registered and approved by the appropriate authority and in accordance with Food and Agriculture Organization's (FAO's) International Code of Conduct on the Distribution and Use of Pesticides.
- Use only pesticides that are labelled in accordance with international standards and norms, such as the FAO's Revised Guidelines for Good Labelling Practice for Pesticides.
- Select application technologies and practices designed to reduce unintentional drift or runoff, only as indicated in an IPM program, and under controlled conditions.
- Maintain and calibrate pesticide application equipment in accordance with the manufacturer's recommendations.
- Store pesticides in their original packaging, and in a dedicated location that can be locked and properly identified with signs, with access limited to authorized persons. No human or animal food should be stored in this location.

- Mixing and transfer of pesticides should be undertaken by trained personnel in ventilated and well-lit areas, using containers designed and dedicated for this purpose.
- Used pesticide containers should not be used for any other purpose (e.g., drinking water) and should be managed as a hazardous waste as described in the General EHS.
- Guidelines. Disposal of containers contaminated with pesticides also should be done in a manner consistent with FAO guidelines and with manufacturer's directions.
- Purchase and store no more pesticide than needed and rotate stock using a “first-in, first-out” principle so that pesticides do not become obsolete. Additionally, the use of obsolete pesticides should be avoided under all circumstances; A management plan that includes measures for the containment, storage and ultimate destruction of all obsolete stocks should be prepared in accordance to guidelines by FAO and consistent with country commitments under the Stockholm, Rotterdam and Basel Conventions.
- Implement groundwater supply wellhead setbacks for pesticide application and storage.
- Maintain records of pesticide use and effectiveness.

4.2.9 Habitat Conversion and Impacts on Biodiversity

117. Project-related land acquisition and activities may have direct, indirect and cumulative risks and impacts on habitats and the biodiversity they support through:

- **Conversion**: These may include habitat loss, degradation and fragmentation; invasive alien species, overexploitation, hydrological changes, nutrient loading, pollution and incidental take, as well as projected climate change.
- **Changes in ecosystem services**: Project-related land use practices and operation of activities may adversely impact on the vital ecosystem services (provisioning services, regulating services, cultural services, supporting services) that are provided by the biodiversity and living natural resources to the project-affected communities.

118. In addition, overgrazing may contribute to soil losses because of severe erosion, and a reduction in soil productivity caused by alteration of the vegetation composition and associated organisms in rangelands. The management techniques discussed below are recommended to further reduce potential ecological impacts:

- The implementation of the project activities should avoid the intentional introduction of invasive alien species.
- Based on the findings of the environmental and social assessment, the ESMF proposed diverse biodiversity management activities including site-specific habitat restoration, enhancement, or improved management; community benefit-sharing; and species-specific management interventions.
- Screening procedures to identify project design solutions that would avoid the negative impacts on forest, natural or critical habitats, or protected areas of high biodiversity, prohibitions or specific restrictions for project civil works contractors and these may cover prohibition of clearing or burning of natural vegetation; off-road driving; hunting and fishing; wildlife capture and plant collection; purchase of wildlife products; and/or free-roaming pets (which can harm or conflict with wildlife).
- Seasonal or time-of-day restrictions may also be needed to minimize adverse biodiversity impacts during construction or operation. Examples include limiting blasting or other noisy activities to the hours of the day when wildlife are least active; and timing of construction to prevent disturbance during the nesting season for birds of conservation interest.

4.2.10 Animal Diseases

119. Animal disease-causing agents can spread rapidly, especially in intensive livestock operations. Animal diseases can enter a facility with new animals, on equipment, and on people. Some diseases can weaken or kill large numbers of animals at an infected facility. In some cases, the only remedy available to an operation is to sacrifice an entire group of animals to prevent the spread of the disease to other parts of the facility or to other facilities. The procedures to protect against the spread of animal diseases will depend on the type of animal at a facility, the way the diseases of concern spread to and infect animals, and the vulnerability of the animals to each specific disease.

The key to developing adequate disease-prevention procedures is to find accurate information about animal diseases and how to prevent them. Some of the recommended general types of management methods to reduce the potential for the spread of animal pathogens include the following:

- Control farm animals, equipment, personnel, and wild or domestic animals entering the facility (e.g., quarantine periods for new animals, washing and disinfecting crates, disinfection and coverage of shoes before entry into livestock zones, providing protective clothing to personnel, and closing holes in buildings to keep out wild animals).
- Vehicles that go from farm to farm (e.g. transport of veterinarians, farm suppliers, buyers, etc.) should be subject to special precautions such as limiting their operation to special areas with biosecurity measures, spraying of tires and treating parking areas with disinfectants.
- Sanitize animal housing areas.
- Identify and segregate sick animals and develop management procedures for adequate removal and disposal of dead animals.
- Establish the temporal animal holding facilities to temporarily hold restocking animal to the maximum days for gestation of any sickness.
- Use services and advice of the veterinary officer before carrying out the restocking of animal to the communities.
- Animal to be used for restocking should be procured from same agro ecological zones.
- Preventive measure like spraying the ticks can be effective for ECF.
- Carry periodic vaccination for the case of RFV and foot and mouth disease.

4.2.11 Risk of contracting zoonosis

120. In the HoA, many people live in close proximity to livestock and depend on them for food and income. Their frequent interaction with animals increases the risk of contracting zoonosis. Pastoral communities are therefore at a high risk of interacting with zoonotic infectious diseases, owing to their livestock management practices, especially their contact with wildlife, and the consumption of bushmeat among some pastoral communities.

Mitigation Measures

- Education campaigns to promote handwashing after contact with animals and other behavioural adjustments can reduce community spread of zoonotic diseases when they occur.
- Animal level the pastoralists should make sure that animals do not get infected; reducing the risk of infection as far as possible, by giving animals clean food and water.
- Vaccinate animals periodically.

4.3 Potential Social Risks and Impacts

121. The findings of the ESMF reveal the social risks and impacts of the project are expected both from the activities in Component 1 and Component 2. Further, the overall potential social risks and impacts of the project are assessed as substantial requiring the project the preparation of appropriate social management plans in order to implement the project. The sub-sections to follow present the summary of the anticipated social risks and impacts of the project.

4.3.1 Potential labor risks

- ***National legal and institutional gaps****:* The review of the exiting national labor laws showed gaps the existing legal framework in providing the requisite protection required by the workers. The labor management procedures specifically apply to the employment opportunities created by the DRIVE project and the different categories of the project workers (direct workers, contracted workers, primary supply workers and community workers). This may seriously jeopardize the working conditions and management of project worker relationships as set out in ESS2.

Mitigation Measures

i. The ESMF provides for the application of ESS2 and includes the Labour Management Procedures (LMP) to further complement the existing labour laws to ensure project workers, contractors are all protected.

ii. The ESMF proposed that it is a good practice for the project to avoid or eliminate sources of hazards to project workers' health and safety, rather than simply addressing the hazard through preventive and protective measures such as personal protective equipment.

iii. When it is not feasible to avoid or eliminate the hazard, appropriate protective measures are included in the project's OHS measures, such as controlling the hazard at its source through the use of protective solutions (for example, exhaust ventilation systems, isolation rooms, machine guarding, acoustic insulation), and providing adequate personal protective equipment at no cost to the project worker.

iv. Measures relating to occupational health and safety take into account the requirements of ESS2 and national law requirements on OHS as set out in the project LMP and workplace conditions as they apply to the project.

v. Project implementing organization and contractors are required to put in place a system for regular review of occupational safety and health performance and the working environment. These many include identification of safety and health hazards and risks, implementation of effective methods for responding to identified hazards and risks, setting priorities for taking action, and evaluation of results.

vi. Services provided to project workers (for example, canteen facilities, nursing facilities, or a camp site), whether directly or through a contractor, are provided in a nondiscriminatory manner, and comply with national law and EHSGs, particularly in relation to quality, security, and safety. Where there are charges to project workers for such services, these should be reasonable with reference to local market prices.

vii. Forced labour: Due to protracted conflict, and weak enforcement of the laws in place, many especially persons from vulnerable communities may be victims of systemic exploitation in the society, and might end up in circumstances that would compromise their freedom including freedom from servitude and forced labour.

viii. Labor disputes over terms and conditions of employment: This might be among the likely causes for labor disputes brought about by weak legal system and institutions.

ix. Discrimination against certain categories of persons: especially women, young men, persons with disabilities, people from minority clans and IDPs among others.

- ***Child labour****:* The availability of large number of off-school children coupled with the income problem of the pastoral households in the project areas may cause or exacerbate risks of children labour. Given this pushing factor, irresponsible private investors may seek to make the advantage of hiring cheap child labour.

Mitigation Measures

- Adhere to the provisions of the prepared Labor Management Procedures (Annex V),
- Minimum age of project workers for the project is set at 18 years and above except for youths who may be recruited as volunteers to gain educational skills.
- All contracts shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance in-line with the relevant national laws.
- The PIU is required to maintain labor registry of all workers with age verifications like use of Identity Cards.
- Subproject environmental and social management plans should clearly forbid the use of child labor.
- All employees to have contract in which the terms of service are clear including salary, leave days and working hours;
- The PIU will ensure that the contractor undertake enforce the policy nondiscrimination in the recruitment, retention, remuneration, and dismissal process and to give each employee an opportunity and refrain from any actions or policies that would lead to discrimination against persons on any basis including clan, gender or social status.
- PIU to ensure every employee has voluntarily signed the employment agreement and no amount of coercion has been induced.
-

4.3.2 Occupational Health and Safety

122. Agriculture has one of the worst fatal accident and occupational health records of any major employment sector. Occupational health and safety hazards related to the daily operations of the mammalian livestock sector include:

- Exposure to physical hazards
- Exposure to chemical hazards
- Exposure to biological agents
- Confined spaces

a) Physical Hazards

123. The occupational safety and health hazards / injuries associated are mainly trip and fall hazards, and lifting heavy weights including animal feeds. The following management measures specific to mammalian livestock production may reduce the risk of accidents and injuries.

- Ensure that all underground manure storage tanks and lagoons are properly covered and fenced off at a sufficient height.

- Store liquid manure (e.g. in barn pits, pumping stations, storage tanks, and application tankers) to minimize release of dangerous gases (e.g., hydrogen sulfide).
- Design pens, gates, and chutes to facilitate movement of livestock and reduce the need for farm workers to enter pens.
- Instruct staff in correct livestock care, to reduce the incidence of bites and kicks.

b) Chemical Hazards

124. Hazardous materials are used throughout the beef and milk production cycles (e.g. disinfecting agents, antibiotic and hormonal products).

Mitigation measures

i. All hazardous materials will be evaluated in accordance with relevant Somalia regulatory requirements.
ii. All chemical substances and compounds purchased from suppliers will be accompanied by their Technical Safety Data Sheets that meet the requirements of Regulation.
iii. Spill kits, protective equipment, and other necessary equipment will be available where hazardous materials are handled, to enable any spills to be cleaned up. Appropriate first aid will be located close to hazardous material storage areas such as eye-wash, showers, and first aid kits.
iv. Hazardous materials will only be transported in vehicles authorized for the transport of hazardous substances.
v. Dedicated fittings, pipes, and hoses specific to the hazardous materials being stored must be used, and procedures followed to prevent the addition of hazardous materials to the incorrect tank.
vi. Equipment that is compatible and suitable for the characteristics of the hazardous material being transferred must be used to ensure safe transfer.
vii. The transfer of hazardous materials from vehicles to storage tanks must be conducted on impervious hard standing, which is sloped to a collection or a containment structure, not connected to wastewater/storm water collection system.
viii. Written procedures for transfer operations must be prepared that include a checklist of measures to follow during filling operations for storage tanks.
ix. Incompatible materials (acids, bases, flammables, oxidizers, reactive chemicals) must be stored in separate areas, and with containment facilities separating material storage areas. The storage and use of hazardous substances will be done under conditions of maximum security.
x. Material-specific storage for extremely hazardous or reactive materials will be provided
xi. All sources of ignition near to flammable storage tanks are prohibited.
xii. Drummed hazardous materials will be stored in areas with secondary containment, whether by bunding or other means.
xiii. Containers holding flammable and/or toxic materials will be kept permanently closed and covered. They shall be kept in their original packaging and they shall be handled and transported under maximum security.
xiv. There will be strict compliance with all relevant guidelines for health and safety at work and with the provisions of the Emergency Response Plan.
xv. Any accidental leaks of fuel or oil will be immediately cleaned up with absorbent material and collected in closed and labelled containers - temporarily stored in specially designed spaces until delivery to an operator authorized for the collection / disposal of oil waste.
xvi. Chemicals with different hazard symbols should not be stored together.
xvii. All hazardous materials must be disposed of according to the requirements of Somali law and regulations.

c) Exposure to pesticides

125. Potential exposures to pesticides include dermal contact and inhalation during their preparation and application as well as ingestion due to consumption of contaminated water. The effect of such impacts may be increased by climatic conditions, such as wind, which may increase the chance of unintended drift, or high temperatures, which may be a deterrent to the use of personal protective equipment (PPE) by the operator.

Recommended management practices include the following:

- Train personnel to apply pesticides and ensure that personnel have received the necessary certifications, or equivalent training where such certifications are not required.
- Respect post-treatment intervals to avoid operator exposure during re-entry to crops with residues of pesticides.
- Respect pre-harvest intervals to avoid operator exposure to pesticide residues on products during harvesting.
- Ensure hygiene practices are followed (in accordance to FAO Guidelines) to avoid exposure of family members to pesticides residues.

4.3.3 Community Health and Safety (CHS) risks and impacts

Improper handling and disposal of animal waste and carcasses could expose the surrounding communities to public health risks through contamination of water, soil and other resources. In addition, unhygienic conditions in meat processing facilities could lead to contamination of meat.

Mitigation measures

- Address community health and safety risks proposes measures in all phases of the project life cycle, for example,
- Incorporate safe road crossings into project design and implement throughout the project life-cycle;
- Establish emergency-response planning and monitoring for pollution or other incidents during operation; putting in place protocols for temporary blasting during demolition at the reinstatement or restoration phase; or establishing health clinics.
- Local health authorities should ensure appropriate processes are in place for community feedback and taking any necessary action.
- The use of skilled trainers to raise awareness among project workers of the risks, expected behaviors, and consequences of violations, communicated through training, and publicized codes of conduct. It may also be important to raise awareness of the risks among community members and local health authorities and inform them about available grievance mechanisms.
- Identify individual groups considered to be vulnerable is an important part of the environmental and social assessment and enables inclusive measures to be incorporated into projects to avoid harm to vulnerable groups and improve project performance.

4.3.4 GBV Risk

126. There is potential to increase *incidence of GBV/SEA:* Women and girls of the project-affected communities may experience increasing incidence of SEA. It is likely that the DRIVE project will introduce benefits or services to the project-affected communities, either momentarily or indefinitely. In such case, project workers may broker access to the benefits or services that are financed through the project. This creates a power differential between the project worker who uses access to the benefits or services to extract gain or favor from those who seek them. The power differential is created when a project worker has real or perceived power over a resource that can then be used to leverage or pressure women and girls of the project beneficiaries into an unwanted sexual act. The project worker may use this differential power to extract sexual gain or sexually exploiting the women and girls project beneficiaries.

127. The implementation of the DRIVE project will create changes in the project-affected communities and can cause shifts in power dynamics between community members and within households. It is therefore recommended to consider broadly the range of potential perpetrators, combined with other contextual and project-related risks, to ensure projects integrate appropriate SEA/SH risk mitigation strategies.

128. The project target pastoral areas where the educational status of the local community members in general and women in particularly is low. Lack of awareness on GBV and associated legal rights may create conducive situation to increase the risks and impacts of GBV.

Mitigation measures

- Sensitization and training of project workers and communities on gender issues, including GBV.
- Preparation and implementation of GBV action plan.
- Instituting Grievance redress committee to handle among others sexual abuses.
- Involving local authorities and police where appropriate in handling sexual abuses.
- Preparation and implementation of a stakeholders' engagement plan, which specifically address gender issues and incidences of GBV in affected communities.
- Train project staff on code of conduct.
- All project personnel should be trained on GBV/SEA awareness as well as the beneficiary community.

4.3.5 Spread of Infectious Disease – COVID-19

129. Possible spread of infectious diseases as a result of failure to adhere to COVID-19 prevention measures. Possible infection route includes: contact with infected mask; weak compliance with the precaution measures for infection prevention and control on COVID-19 including hand washing hygiene, respiratory / cough antiquates among others.

Mitigation Measures

- Train all project workers and community members on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms.
- Institute a grievance procedure to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing.
- Mandatory provision and use of appropriate Personal Protective Equipment (PPE) shall be required for all project personnel including workers and visitors.
- Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks.
- Avoid concentration of more than 15 persons at one location. Where more than one person are gathered, maintain social distancing of at least 2 meters.

- Fumigation of offices, work areas, store and project vehicles delivering food to the schools.
- Train all workers in respiratory hygiene, cough etiquette and hand hygiene.
- Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated.

4.3.6 Spread of HIV/AIDS and STIs

130. Movement of the project staff from one location to another may result into illicit sexual behaviors such as prostitution, defilement and sexual exploitation and abuse between project workers and communities. This may lead to increased transmission of HIV/AIDS and other sexually transmitted diseases within the project area.

Mitigation measures

- Carry out periodic HIV/AIDS awareness for workers and staff,
- Carry out voluntary HIV/AIDS testing for workers; and
- Workers should sign the CoC and abide by its provisions for HIV/AIDS awareness and prevention.

4.3.7 *Social Exclusion*

a. Exclusion of *Deserving Groups and Individuals (poor Pastoralists, Vulnerable Groups, Women Youth PWDs)*

131. Vulnerable communities may be disproportionally disadvantaged or made more vulnerable by the project interventions. As a result, such communities could fail to benefit from development and opportunities resulting from the project discrimination and exclusion during the selection and of beneficiaries and provision of project inputs including awareness raising, capacity building, accessing of insurance premiums and credit for investment among others. Additionally, it is possible that disadvantaged categories such as women, differently abled persons and elderly could be excluded from planning processes and implementation since there largely invisible in most pastoralist communities.

Mitigation Measures

i. Inclusive consultations and focused group particularly to ensure participation of women and other vulnerable groups are provided for in project EMSF and related instruments.
ii. Development and implementation of intentional targeting guidelines by project management and staff.
iii. Undesired contact and conflict of cultural norms: there are remote pastoral communities with limited external contact or people in voluntary isolation in the project target areas. Undesired contact with these people (due to service provisions (Component 1) and livestock value chains interventions (Component 2)) may lead to a significant adverse socio-cultural impacts on them.
iv. As per the ESCP conduct screening and community consultation at each sub-project area and confirm the presence or absence of IP/Sub-Saharan Historically Underserved Traditional Local Communities as per ESS7 to determine the applicability of the standard, and if available. If ESS7 groups are found in implementation areas, then IPPPs shall be prepared.

b. *Poor Stakeholder Engagement*

132. The level of participation of all relevant stakeholders during project planning and designing depends on the level and quality of engagement employed. Top-down approaches should be avoided and allow stakeholder driven approaches to promote ownership of the project by the locals. Poor participation in project implementation increases the low chances of sustainability of the project.

Mitigation Measures

i. Preparation of a project Stakeholders Engagement Plan for the project. ZEP-Re and MoF-PIU will have an External Communication Strategy for the project.
ii. Targeted community engagement with minority groups that will include the minority clans, women, communities living in remote areas, persons living with disability and other minor groups.
iii. Adequate budget for allocation of the stakeholder engagement and consultation process.

c. *Project Beneficiaries not having access to GRM*

133. The Project beneficiaries may not be having access to GRM. This will disadvantage them in many ways as they will not be able to raise their complaints once aggrieved by the project activities. Even in the selection process, if somebody is not selected and felt that they should have been selected, and they have issues or problems with the process, will they have access to the GRM.

Mitigation Measures

i. The project will establish a project specific GRM with multiple channels of receiving grievances or complaints that is accessible to all interested parties. ZEP-Re and MoF-PIU will have well functional complaints mechanism.
ii. Awareness creation and stakeholders' engagement on the grievance redress mechanism, using local language.
iii. Adequate budget provided for the implementation of the grievance redress mechanism.

d. *Social Exclusion and Poor Beneficiary Targeting*

134. The planning and implementation of the project services and benefits may exclude vulnerable groups such as women and girls and people with disabilities. For instance, the long standing patriarchal socio-cultural and economic system in the project target pastoral communities may discriminate against women and girls during sup-project preparation, community engagement or in benefiting from the project services. This may further reinforce the existing social exclusion. When there are no clear selection criteria of project beneficiary areas and communities' conflict may arise. Failure to recognize/appreciate local community definitions (explicit and implicit) of vulnerability is likely to create conflict with and among community members as well as perpetuating gender inequalities. Income disparity: The project intends to target certain groups within the project-affected communities rather than extending to all members. That means the project services makes distinction between beneficiaries and non-beneficiary groups within the same community or area. This may create or exacerbate the Income disparity among beneficiaries and non-beneficiaries of the project.

Mitigation Measures

i. The project will establish clear criteria for selection of beneficiary production pastoralist groups.
ii. Awareness public awareness on the project beneficiary targeting criteria.
iii. Establish a grievance redress mechanism to receive and resolve grievance related to project targeting.
iv. Undertake screening to establish the vulnerable in the community before project commencement in each project area.

4.3.8 *Differential Gender Risks*

135. Due to a strong patriarchal system in pastoral communities, the implementation of the DRIVE project may exacerbate the existing gender inequalities. For example, women may be denied access to financial literacy training as that is cultural exclusive to men and, thus, may further exacerbate the discrimination against women. Payment of insurance monies by lead to non-SEA gender based violence that could lead to physical abuse and exacerbate intimate partner violence.

Mitigation measures

i. In project activities potentially affect remote groups with limited external contact, the project will take appropriate measures to recognize, respect, and protect their culture, language, and traditional institutions specifically clans.
ii. The project GBV Action Plan provide prevention interventions and referral mechanism for GBV cases within the project area.

4.3.9 Potential for Conflict and Security Risks

136. There are widespread security risks in Somalia to varying degrees for communities, contractors, and project staff. Implementation will be a challenge in al-Shabaab-controlled areas and security issues need to be carefully assessed and managed elsewhere. The use of security forces either during travel or at protect sites will need to be carried out in line with the World Bank's Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel. There are a range of contextual risks of operating in conflict zones with complex social contexts where effective and inclusive community consultations and meaningful stakeholder engagement is challenging. The common source of security risks in all project-target areas are area-specific to some of the following:

- ***Conflict over pasture, land and water:*** One of the recurring causes of conflicts common to all the pastoral communities in the project areas relates to access to grazing pasture and water sources. This has been caused by the degradation and reduced carrying capacity of the rangelands (encroachment and little, erratic rain) combined with continued overgrazing by large cattle herds. This results in competition over resources, especially during droughts and dry seasons when the nutritional conditions of livestock are meager. The limitations of the rangeland resources and the subsequent competition often lead to violent conflicts within and between different clan groups in the project areas.

- ***Territorial conflicts:*** Besides being valuable livelihood resources, many natural resources such as rivers and forests or grazing areas serve as the boundaries between neighboring ethnic groups in the project areas. Hence, conflicts over access to natural resources often transform into more protracted boundary and territorial conflicts. This contextual security risk analysis applies to all the pastoral groups in the project areas.

- ***Livestock raiding as source of recurring conflicts:*** Livestock raiding are another source of recurring conflicts common to all the pastoral groups in the project areas. Livestock raiding are generally considered as an acceptable means to acquire assets, whether in times of retaliatory conflicts or under normal circumstances. In particular, the need for cattle is very important for young men who have no assets, as their inheritance is often small because it is divided among many siblings.

158. A project level security risk assessment and management plan is provided in annex IX. The SMP includes specific measures for project workers and contractors and will be referred to in the contractors' contracts. measures and actions will be implemented to manage the risks to the human security of project-affected communities and project workers that could arise from the use of security personnel, or communal violence, or any incident that may be directly or indirectly connected with project activities. Specific commitments on use of security personnel have been included in the ESCP. The SMP will be updated to provide specific details on security arrangements and the preparation of site specific SMPs within three months of effectiveness.

Mitigation Measures

- Community consultations should be meaningful and inclusive to avoid elite capture and further marginalization of minority groups and clans.
- Grievance address mechanism should be in place to solve any arising issue right from community level and project level.
- Adhere to the provision of community grievance redress mechanism procedures in resolving emanating social issues.
- Use the culturally accepted alternative dispute mechanisms including mediation, negotiation and conciliation by seeking elders to solve conflicts/ religious leaders.
- Sensitize implementing staff on conflict sensitive project implementation.
- Project staff and consultants should be sensitizing on conflict sensitive project implementation.
- Project staff should be periodically subjected to security awareness campaigns.
- Project team should have alternative communication devices where network coverage is limited.

5 Procedures for Preparation, Review, Clearance, and Implementation of Safeguards Instruments

137. The environmental and social procedures in the DRIVE require the MoF to carry out an environmental and social assessment of the project to assess the environmental and social risks and impacts of the project throughout the project life cycle. The assessment will be proportionate to the potential risks and impacts of the project, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts throughout the project life cycle. Using the major steps outlined below, the procedures will evaluate the project's potential environmental and social risks and impacts; examine project alternatives; identify ways of improving project selection, siting, planning, design and implementation in order to apply the mitigation hierarchy for adverse environmental and social impacts and seek opportunities to enhance the positive impacts of the project.

5.1 Subproject screening, preparation, approval and implementation

Subproject screening

138. Using the criteria for subproject screening is indicated in ***Annex I;*** it has a clearly defined risk categories including the exclusion list. In determining the appropriate risk classification for the subprojects, the DRIVE project will take into account relevant issues such as the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential environmental and social risks and impacts; and the capacity and commitment of the MoF (including any other entity responsible for the implementation of the project) to manage the environmental and social risks and impacts in a manner consistent with the WB's ESSs.

139. Other areas of risk may also be relevant to the delivery of environmental and social mitigation measures and outcomes, depending on the specific subproject and the context in which it is being developed. These could include legal and institutional considerations; the nature of the mitigation and technology being proposed; governance structures and legislation; and considerations relating to stability, conflict or security.

140. Accordingly, based on the screening process undertaken all subprojects will be screened: (a) against exclusions in the National, WB or International Policies/Laws; and (b) for risk category or the severity and extent of potential environmental and social risks and impacts.

141. The following types of activities are ineligible for financing under the Project and have been included in the ESCP:

- Any activities resulting or anticipated to result in permanent or temporary physical or economic displacement.
- Any activities involving adverse impacts on biodiversity conservation and sustainable management of living natural resources.
- Any activities that have adverse impacts on cultural heritage as defined under ESS 8.
- Any activities that, due to the nature and scale of the activities, would result in a wide range of significant adverse impacts and risks, which are long-term, permanent, and/or irreversible, impossible to avoid entirely, and cannot be mitigated or required complex, unproven mitigation and excessive associated costs, rendering its risk classification as high.
- Production or trade in any product or activity deemed illegal under the Recipient's laws or regulations or ratified international conventions and agreements.
- Production or trade-in pesticides/herbicides subject to international phase-outs or bans.

- Any activities that would curtail workers' fundamental rights. These would include: (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory labor; (iii) prohibition of child labor, including without limitation the prohibition of persons under 18 from working in hazardous conditions (which includes construction activities), persons under 18 from working at night, and that persons under 18 be found fit to work via medical examinations; (iv) elimination of discrimination in respect of employment and occupation, where discrimination is defined as any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction, or social origin.
- Production or activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such peoples.

142. The environmental and social classification for the project is substantial. Assigning of appropriate environmental and social risk classification to a sub-project activity shall be based on information provided in the environmental and social screening on Annex 1.

Subproject preparation and approval

143. Based on the environmental and social screening of the sub-projects the beneficiary agencies environmental and social focal points will prepare the relevant environmental and social risk management tool (ESMP/ESIA) which will be submitted to the PIU for review and quality assurance, and thereafter to the World Bank for review and approval.

144. The Safeguards Specialist's at PIU duties include backstopping the sub-project implementing teams to comply with the relevant National Environmental and Social requirements and the World Bank environmental and social safeguards standards. This includes reviewing, screening, approving, monitoring and reporting on the progress of the sub-projects. Monitoring and review will be done periodically (quarterly) to improve capacity to manage safeguards compliance amongst local stakeholders. The Environment and Social Instruments prepared (site specific ESMPs, ESIAs, LMPs, among others) for the Technical Assistance shall be reviewed by Environmental and Social Specialists at PIU and cleared by World Bank.

145. All the activities to be financed under the DRIVE will follow the provisions described and agreed in the SEP, LMP, GBVAP and other due diligence instruments prepared to ensure proper management of environment, social, safety and health requirements. Environmental and social monitoring seeks to check the effectiveness and relevance of mitigation measures through the implementation/operation phase. The PIU shall monitor project activities by coordinating and working closely with the implementing agencies and Environmental and Social focal points within implementing partner organisations.

5.2). Disclosure of ESMF and other ESRM Instruments

146. In carrying out the ESIA or ESMP, supporting evidence of comprehensive public consultation shall be required, such as signed minutes of consultation meetings, attendance lists and filled-in questionnaires. Public consultations shall take place during the environmental and social screening process and during the validation of the ESIA report. The results of public consultation shall be incorporated and or influence the design of mitigation and monitoring measures. ESIA study reports for the subproject shall be disclosed in-country by the client (MoF) in formats that are accessible to all project stakeholders and on the World Bank external website. Public consultations should be conducted in a manner accessible to all project stakeholders and taking into account the guidance set out in the project Stakeholder Engagement Plan and any other relevant guidance.

6 INSTITUTIONAL ARRANGEMENTS FOR ESMF IMPLEMENTATION

6.1 Institutional Arrangements

147. The project will use initially the existing Project Implementation Unit (PIU) of SCALE-UP within the Ministry of Finance to coordinate the project's implementation. This unit will be responsible for the fiduciary responsibilities (procurement and contract management, financial management, environmental and social safeguards), the overall project implementation and coordination with stakeholders.

148. Since the project is multi-sectoral in nature and involves several line Ministries (Finance, Commerce, Agriculture and Livestock, Quality Infrastructure Agencies, Central Bank, ZEP-RE), a steering committee will be established in all countries to oversee the project. The Project Steering Committee consisting of the Directors Generals (DG) of the beneficiary ministries and chaired by the DG Ministry of Finance will oversee the project. Main ministries include the Ministry of Commerce and Industry, the Ministry of Livestock and Rangelands, the Somali Bureau of Standards and the Ministry of Finance for project oversight as well as ZEP-RE. It is expected that the steering committee will convene at least three times annually to review progress in meeting the development objectives, to review project resources management, to monitor the results framework and to provide corrective measures as warranted. The PIU will act as a Secretariat to the Steering Committee. ZEP-RE will attend the steering committee to provide a strong link with Component 1.

6.1.1 Project Unit (PIU)

149. The PIU will comprise experts with different skills who will be responsible for the implementation of the project including but not limited to the following general functions: contracts management, procurement, financial management, stores management, safeguards and reporting. The PIU shall have, as core staff, the following: (i) Project Manager/Program Coordinator; (ii) Financial Management Specialist; (iii) Procurement Specialist; (iv) Project Engineer; (v) Environmental Safeguards Specialist (who will responsible for the health and safety issues as well), (vi) Social Safeguards Specialist; (vii) Gender Specialist, and (viii) Monitoring and Evaluation Specialist. The PIU staff shall have the responsibility to oversee the project implementation, perform the required technical functions, and serve as the focal points for communication with Bank, contractors and consultants. The PIU will be responsible for collecting, verifying, and collating information, integrating the M&E reports, and submitting to the World Bank both the quarterly and annual progress reports.

6.2 Capacity Development for Environmental and Social Management and Monitoring

150. This section describes institutional capacity assessment, capacity building, training and technical assistance included in the project to ensure effective implementation of the ESMF. These efforts will not only benefit the DRIVE project but will also build local capacity to undertake other development initiatives funded locally or by other donors.

151. Generally, there is low capacity of the implementing agency to manage and monitor environmental risks as shown by an assessment of the key implementing agencies MoF. There is very limited capacity in terms of staffing, financial resources and skills on ESF requirements.

152. On top of the existing structural challenges, the institutional capacity assessment at all levels of implementing arrangement (federal to local project staff), envisages the technical knowledge gaps on the side of the managements and project personnel regarding relevant national and WB's environmental and social policies, implementation and monitoring of the ESMF, GBV awareness and implementation of action plan and preparation, approval and implementation of sub-projects. Therefore, the ESMF includes components in the project to strengthen the existing institutional and technical capacity to carry out key environmental and social assessment functions.

153. There are gaps in the existing national laws, polices and regulations for environmental and social management, number and required qualification of the man power from federal to local level of implementing arrangement, experience relevant to carrying out environmental analyses for multiple-subprojects, and logistics and budgetary resourced required to effectively implement the ESMF.

154. A project level capacity building support on E&S including enhancing the E&S capacity through staffing and training on the ESF requirements based on a robust capacity building plan to be implemented. Table 6-1 below give the proposed budget for implementing capacity building plan for the safeguards team.

Table 6-1: Capacity Building and Training Plan

Objectives	Issues for engagement	Method of engagement	Stakeholders/Target population and area	Responsible person	Time frame	USDs
ESMF	Training of all Technical Leads in the ESMF, World Bank Safeguards Awareness, Training of Environmental and Social Standards, Citizen Engagement (Events and workshops for community awareness in the Project areas).	Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments. Private sector, CBO, and other interested stakeholders	PIU	Prior to commencement of activities	100,000.00
ESIAs, ESMPs, ESAPs	Training of all Technical Leads in the Environment and Social Safeguards Instruments, World Bank Safeguards Awareness and Training of Environmental and Social Standards	Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments. Hired Ministry ESIA Consultants	PIU	Prior to commencement of activities	150,000.00
GBV Action Plan	Training of all Technical Leads in the GBV Action Plan	Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments.	PIU	Prior to commencement of activities	50,000.00
GBV Procedures for Reporting and Prevention	Training and monitoring during project implementation to prevent GBV and support reporting of cases	Training, monitoring,	Community members / vulnerable groups	(Lead of GBV sub cluster)	Prior to commencement of activities	100,000.00
Mitigate impact of workers on local communities (LMP & GBV Action Plan)	Implement training of contracted Project Workers designed to heighten awareness of risks and to mitigate impacts on local communities and on their rights	Training and awareness creation	Contracted workers in Project locations	All Technical leads	Prior to deployment	50,000.00
GBV	Response to domestic issues in a non-gender biased manner.	Training	Local leaders (as detailed in the GBV Action Plan)	PIU and Technical Leads	Prior to commencement of activities	30,000.00

Objectives	**Issues for engagement**	**Method of engagement**	**Stakeholders/Target population and area**	**Responsible person**	**Time frame**	**USDs**
Project GRM	Consultation on different GRMS mechanisms in place, development of overall GRM, and Training with all Technical Leads Set up Grievance Redress Mechanism and functioning in the Energy sector	Consultations Training, and Disclosure	Technical Leads / relevant staff responsible for the implementation of E&S instruments.	PIU	Prior to commencement of activities	100,000.00
Create awareness of LMP and H&S Standards for workers	LMP and H&S Standards	Training	Contracted workers in Project locations	Technical leads	Prior to deployment	Included above
Support Emergency Response Measures	Communication of Emergency Response Measure (ERM) to communities	Information, training	Communities in Project areas	PIU	Prior to commencement of activities	50,000.00
Community Health & Safety	Road Safety Awareness	Training	Communities in Project areas, with particular focus on vulnerable communities	PIU and Technical Leads	Prior to commencement of activities	Included above
Community Health & Safety	Communicable diseases	Training	Communities in Project areas	PIU and technical leads	Prior to commencement of activities	Included above
Total						**630,000**

6.3 Monitoring and Reporting

155. Monitoring of results will be a key responsibility of the PIU. The PIU will be responsible for collecting, verifying, and collating information, integrating the M&E reports, and submitting to the World Bank both the quarterly and annual progress reports. The PIU shall establish a database for each component of the project to periodically monitor the evolution of implementation, outputs, and results, with systems for regular data gathering and processing of information required to monitor the main performance indicators and intermediary indicators as defined in the results framework. The PIU shall collect and compile data to provide basis for a compressive mid-term review. The PIU will also undertake an end term review and final Implementation and Completion Results Report.

156. The PIU will be responsible for overall implementation and management of awarded contracts in accordance with the agreed contractual obligations. The contract management/administration/monitoring/supervision is perceived as function of the user sections/technical departments, often the procurement team is not updated with the progress (Physical / Financial) and changes/variations (amendments). The Procurement Specialist at PIU will be entrusted with contract management function jointly with the concerned user/technical departments.

157. This ESMF has identified preliminary potential environmental and social issues and risks related to the project activities and have proposed subsequent mitigation measures. To ensure effective implementation of measures, the following monitoring and reporting system which include both internal monitoring and reporting and external monitoring and evaluation. This will be enhanced further in the ESMF to be developed prior to conceptual design of project components

158. The significance of monitoring stems from the fact that the inputs will go into the project design and planning, including mitigation measures, are based largely on "predictions". It is essential that the basis for the choices, options and decisions made in formulating or designing the project and other environmental and social safeguard measures are verified for adequacy and appropriateness. Monitoring verifies the effectiveness of impact management, including the extent to which mitigation measures are successfully implemented. Monitoring specifically helps to:

- Improve environmental and social management practices.
- Check the efficiency and quality of the EA processes;
- Establish the reliability and credibility of the EA for the project (as well as the quality of experts providing EA consultancy services in the DRIVE); and
- Provide the opportunity to report the results on safeguards and impacts and proposed mitigation measures implementation.

6.3.1 Internal Monitoring and Reporting

159. Internal Monitoring shall begin once E&S project documents are approved and disclosed and the project implementation has commenced. The PIU (and other implementing agencies, as appropriate) commence monitoring as an important feedback mechanism. In ensuring their effective monitoring process, the PIU will deploy different methods like stakeholder consultation, field visits, review checklists, third parties monitoring where appropriate. This activity will ensure that the environmental and social mitigation measures are:

- Identified in the planning phase (contained in the ESIA reports), and incorporated in the project design and cost are being implemented.

- Are maintained throughout the operation phase, and to the decommissioning of sites, facilities and equipment; and
- Where inadequate, additional remedial actions are identified (including corrective measures or re-design of mitigation measures).

160. The monitoring by PIU shall actively and effectively monitor the contractors engaged in the DRIVE subproject and covers other areas such as adherence to the environmental and social clauses and principles. The ESMPs that are prepared and/or the other mitigation provisions that are made as components or part of the project environmental and social assessment will also be monitored.

161. The monitoring results will be analysed, and the monitored information and recommended actions will be compiled for the attention and action of the respective implementing agencies. The monitoring report will be formalized with the agency's agreed action and timeframes and submitted as the respective implementation agency's MoF, and the Bank.

162. PIU shall assume the responsibility of leading the monitoring and reporting on the compliance of project implementation. The PIU must put in place an effective internal monitoring mechanism. It shall be fully capacitated to undertake such tasks thereby recruiting regional safeguards specialists for effective monitoring of sub-projects.

163. The PIU shall ensure that the mitigations outlined in this ESMF is implemented by engineers and environment and Social specialists.

164. The PIU Environmental and Social Specialists will assess the compliance of all implementers' activities against the Framework Instruments and their subsequent ESMPs, and other relevant action Plans and will report possible non-compliance to the Project Coordinator of the PIU. Indicators would be identified in the framework and Plan documents, and used as a baseline for assessing progress on implementation.

165. The project monitoring framework shall develop standard reporting forms which shall provide for quarterly and yearly reports. This will include:

- List of consultations held, including locations and dates, name of participants and designations.
- Main points arising from consultations including any agreements reached.
- A record of grievance applications and grievance redress.
- GRM implementation Progress Report,
- Progress report on Capacity Building plan
- Safeguards staff at the regional level will prepare consolidated quarterly monitoring reports on respective sub-projects which in addition to the above data will include:
    - Number of MoF staff, and trained on ESMF compliance,
    - Number of consultations and groups consulted.
    - Update on grievances including pending cases.

6.3.2 External Monitoring and Reporting

166. The project shall incorporate external monitors. The PIU shall share project monitoring reports with the Bank and these reports would be assessed to ascertain ESF compliance using site-specific ESMPs/ESIAs if prepared. The ESF compliance assessment will assess whether:

(i) the ESMF, and other relevant Framework process is being correctly adhered to;
(ii) relevant mitigation measures have been identified and implemented effectively and whether these need to be adjusted to reflect changing circumstances and;
(iii) the extent to which all stakeholder groups are involved in sub-project implementation.

167. The PIU Environmental and Social Specialists will assess the compliance of all implementers' activities against the ESMF and their subsequent ESMPs and will report possible non-compliance to the Project Coordinator of the PIU. Indicators are identified in both documents, and used as a baseline for assessing progress on implementation. The PIU will also independently conduct its own monitoring, verification and inspection of the activities of all implementers to ensure they are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts. Performance will be integrated into quarterly reports to the WB.

168. The World Bank will equally supervise and assess the environmental and social performance through review of the biannual monitoring reports and through regular site visits.

169. The GRM will further help track complaints and effectiveness of interventions, including those with environmental and social impacts.

170. Furthermore, Third Party Monitoring Agents (TPMA) will be deployed to monitor overall project implementation, including the implementation of E&S Risk Mitigation Measures. The TPMA will report non-compliance to the PIU and directly to the World Bank.

171. Upon completion of the Project, the PIU shall undertake an assessment of the success of the ESHS instruments and include relevant information in the Implementation Completion Report (ICR). This ICR will be followed by the Bank's own ICR. If either of these assessments reveals that any key objectives of the ESHS instruments were not achieved, follow-up measures shall be developed to remedy the situation. This is also applicable for site-specific ESMPs and other action plans.

6.4 Bank's Supervision

172. The Bank will provide the second line of monitoring compliance and commitments made in the ESCP through implementation support missions albeit in a less frequent manner and detail as compared to the first line of monitoring that will be undertaken by the PIU. The Bank will further undertake monitoring during its scheduled biannual implementation support missions. Specifically, for each year that the agreement is in effect, sub project contractors will be required to submit to the monthly, quarterly monitoring reports to the PIU will consolidate and summarize these reports and submit to the Bank as part of its reporting to the Bank and the Bank supervision missions will review these reports and provide feedback. Table 6.2 presents environment and social monitoring plan and responsible parties.

7 Grievance Redress Mechanism (GRM)

168. The ESMF provides project-level grievance mechanism, process, or procedure to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project. Project's Environmental and Social Safeguards personnel in the project area are the lower-level of the GM structure responsible for managing/operating the GRM. The next structure refers to the implementing organization in order of hierarchies (local, regional, and government). If the project-affected parties with the complaints not satisfied by the complaint responses of these GM structure, they can submit their complaints to the World Bank's Independent Inspection Panel to request an inspection to determine whether harm has occurred as a direct result of project performance's noncompliance with ESSs and procedures. Once all possible redress has been proposed and if the complainant is still not satisfied then the project-affected parties with the compliant will be advised of their right to the formal legal recourse.

169. A systematic and functional GRM will be adopted to address the concerns of aggrieved parties (PAPs, vulnerable groups including women, IDPs, gender-sensitive issues, workplace concerns and community concerns). Such a mechanism will detail the processes involved in registering grievances at no cost to the aggrieved parties as mentioned above. A grievance could mean a simple query or inquiry, concern, issue, or formal complaint that bothers the lives of aggrieved parties. The layers of the GRM will be well publicized as a way of educating PAPs, recruited workers and other residents on the process. Alternative means of access, however, will be the public information centers that will be established at various project sites. At the same time, information about where complaints can be lodged should be provided by the PIU and or the consultant and will be published on public notice boards, communicated verbally at all public meetings, and outreach sessions so that there is a wider public understanding and acceptance of the mechanisms proposed for grievance redress.

170. The primary purpose of the GRM is to hear the complaints or address the concerns of aggrieved parties to a fair extent and on time. Dissatisfaction can cause an aggrieved party to act beyond expectations, which would culminate in some unforeseen repercussions that would negatively affect project implementations and stall project progression. For this reason, the GRM will strive to resolve grievances at the lowest level possible, but with opportunities for the aggrieved parties to escalate their complaint to higher tiers of the project's GRM should they be dissatisfied by the resolution of the project's lower GRM tiers. The GRM will be time bound at each tier, and will include information on the opportunity access external GRM channels including arbitration/mediation, the country's legal redress systems and the World Bank's Grievance Redress Service (GRS) and the Inspection Panel, if the complainant is not satisfied with the project level GRM Consequently, the GRM to be proposed during the preparation of the sup projects' ESIA or ESMP shall seek to achieve the following objectives:

- Encourage registration, acknowledgment, and recording of all concerns or issues raised by aggrieved;
- Identify the frequencies of issues raised: for instance, unpaid compensation, inadequate compensation, disregard for local ritual ceremonies, land acquisition, workplace concerns and many more;
- Ensure that complaints are properly registered, tracked and documented, with due regard for confidentiality;
- Address the composition of a committee that would handle all grievances; Inform people of the public information centre establishment and access;
- Establish procedures for the GRM to enhance easy access, transparency and accountability, and tackle escalation of grievances beyond expectations;

- Manage the concerns raised by aggrieved parties to achieve a win-win situation within a reasonable time frame that would comply with national and international best practices; and
- Record all resolutions agreed upon by all parties involved and ensure that aggrieved persons are satisfied with every outcome of remedial resolution to foster harmony in sub-projects.

7.1 Potential Sources of Grievance

171. The potential source of grievance may be corruption or unfair benefits to some. Similarly concerns that the compensation due to PAPs may be paid very late, which could create considerable stress and inconvenience and lead PAPs to incur further costs; undervalue of assets, land tenure issues where two or more parties claim ownership, resettlement issues where the proposed new site is "no as good" as the former land. Other sources of grievance may include work-related concerns such as terms of the employment, rights related to hours of work, wages, overtime, compensation and benefits injuries, deaths, disability, disease and OHS hazards to project workers.

7.2 Grievance Resolution Approach

172. The scope, scale and type of grievance mechanism should be proportionate to the nature and scale of the potential risks and impacts of the project.

- A grievance mechanism will be designed based on an understanding of the issues that are likely to be the subject of concerns and grievances in the project. The appropriate design and scale of the grievance mechanism will be subproject-specific.
- Grievance mechanism will be readily accessible to all project-affected parties and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely fashion, and facilitates resolution of concerns and grievances arising in connection with the project. The grievance mechanism of the project will provide project-affected parties with redress and helps address issues at an early stage.
- Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive, and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed.
- The grievance mechanism is expected to address concerns objectively and in a transparent manner. The involving process or procedure will not prevent the right of the project-affected parties to access formal judicial or administrative remedies concerning the subject of grievance being raised. Also, the grievance mechanism will allow for anonymous complaints to be raised and addressed.
- The grievance mechanism will provide specific places and ways whereby grievances would be received and the means by which they can be submitted (for example, mail, text message, e-mail, website, telephone, suggestion/complaint boxes, grievance form); specifies a person, an office, or an institution responsible for processing grievances; and establishes timelines for processing a complaint and a process for registering and monitoring grievances. Grievance mechanisms for larger or more complex subprojects may have multiple locations, means, and methods to receive, process, and monitor grievances, an adequately staffed team, and an appeals process.

- Actions taken on the grievance or suggestions should be informed and balanced. The time frame for grievance resolution depends on factors such as the urgency of the complaint; need for research, investigation, consultation, and funding; and institutional capacity.

7.3 Procedures and Timeframe

173. The project GRM will involve the following procedures and timeframe:

- Step 1: Submission of grievances either orally or in writing.
- Step 2: Recording of grievance and providing the initial response within 24 hours.
- Step 3: Investigating the grievance and communication of the response within 7 days.
- Step 4: Complainant response: either grievance closure or taking further steps if the grievance remains open. Once all possible redress has been proposed and if the complainant is still not satisfied then the project-affected parties with the compliant will be advised of their right to the formal legal recourse.

7.4 Grievance Log

174. The project grievance mechanism should have a log where grievances are properly registered in writing and maintained as a database. Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via a web site. But, that needs to be properly recorded and documented.

175. The log will contain record of the persons responsible for an individual complaint, and records of dates for the following events:

- Date the complaint was reported;
- Date the Grievance Log was added onto the project database;
- Date information on proposed corrective action sent to complainant (if appropriate);
- The date the complaint was closed out; and
- Date response was sent to complainant.

7.5 Project-level GM structures

7.6 Guidelines and Tools for Reporting and Processing Grievances (particularly GBV/SEAH)

176. Grievances will be filed by an aggrieved person at the entry-level using a complaint form. The form will describe the complaint and provide for action at the three levels of redress-community district, Municipal or FMS. Ideally, complaints should be acknowledged in 7 days, provide feedback in 21 days and resolved within Forty-Five (45) days, except complaints and grievances that relate to the valuation of affected assets that need to be managed by a unit set up by the project.

177. Survivors of Gender-based Violence or Sexual Exploitation and Abuse are generally encouraged to report all GBV/SEA cases through the dedicated GBV/SEA referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information. The GBV/SEA referral system will guarantee that survivors receive all necessary services, including medical, legal, counselling, and that cases are reported to the police where applicable.

178. If such cases are reported through the Project GRM, the GRM Operator needs to report the case within 24 hours to the PIU, as the PIU is obliged to report any cases of GBV/SEA to the World Bank within 48 hours following informed agreement by the survivor. Furthermore, cases need to be reported to the IP, if it concerns a direct worker or a worker from a sub-contractor, NGO partner or even a community worker following a survivor-centered approach. This may be in addition to criminal prosecution, to ensure that sanctions for the violation of Code of Conducts are implemented. IPs are in charge of monitoring that the courses for contractors regarding the Code of Conduct obligations and awareness raising activities to the community are in place. The information gathered would be monitored and reported to the PIU and the World Bank. All reporting will limit information to 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.

179. All complaints received in writing (or written when presented verbally) and processed through the stages identified in the GRM, will be recorded in a register or log sheet. The register presents the date of the complaint, the name of the complainant, the community he/she is from, a description of the complaint, and the actions taken to address the grievance (which shall also note the status of the grievance).

180. Simple guidelines for processing and reporting grievances that can be adapted to the different contexts of the project are presented below:

- All grievances concerning non-fulfillment of contracts, levels of compensation, or use/demolish assets without compensation, work-related concerns, etc. shall be addressed to the GRC. All attempts shall be made to settle grievances amicably. Those seeking redress and wishing to state grievances will do so directly to the GRC. If the complainant's claim is rejected, the matter shall be brought before an agreed third party or the local administration before approaching the legal system in case of unresolved complaints at the local level also.
- The GRC shall maintain records of grievances and complaints, including minutes of discussions, recommendations and resolutions made;
- The grievance being reported should be clearly defined;
- The type of grievance being documented should also be defined in terms of how it is received: oral, written, by mobile phone, email, or text message. There should be a clear description of the owner of the complaint or where the grievance comes from to ensure accessibility to the GRM.

181. Aggrieved parties should choose their entry point that is at their convenience. However, the GRM should start at the local level before allowing appeals to higher levels at the District municipal or FMS levels. If it is at the community level/site specific level, the first point of contact would be the Contractor site in-charge. Is the GRC established by the project at the district level? The point of contact at the district level is the district Council. The point of contact at the provincial level is the key supervisory body of the GRC or relevant agencies responsible for monitoring the sub-projects:

- Mobile phone hotlines should be maintained to provide aggrieved parties with the access they need to those who can document and address their grievances;
- At all three levels, a grievance registry should be maintained to monitor and record the types of grievances that are raised, their status, and the type/level of remedial actions taken.

- Remedial actions have to be flexible they can vary from a letter response to a referral (to the next redress level/structure), a meeting or dialogue with the complainant(s), a final resolution process beneficial to all parties;
- Acknowledgment of receipt of grievance reports should be within seven days. This can be done by any member of the GRC/ local authority and should be forwarded to GRC. Grievances should be addressed in twenty-one (21) days following the report or be moved to the next level in the redress mechanism where the problem should be resolved within fourteen (14) days;
- Outcomes from the decision should be provided within thirty (45) days of the receipt of the complaints, which should be communicated by the appropriate GRC representative. Once a grievance or complaint has been resolved or being escalated, the officer responsible shall complete a Grievance/Complaint Resolution/Escalation Form (see Annex IV) to close out the complaint or record the reason for escalation, and the form shall be signed by the officer and the complainant (if s/he so desires), with a witness.
- The court of law will serve as the last resort for all types of grievances. Responsible structures for grievance redress should ensure that this option is avoided as much as possible. However, the decision to use the court as a redress mechanism should be left to the discretion of the aggrieved parties.
- World Bank's Grievance Redress: Communities and individuals who believe that they are adversely affected by a World Bank (WB) 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/GRS. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org. It is however recommended that a project level grievance mechanism that has been agreed upon by all stakeholders is put in place early, to prevent small matters from snowballing into conflicts that may lead to delayed disbursement and implementation.

- The practical steps to be used in addressing grievances for this project are presented in Figure 7-1 below:

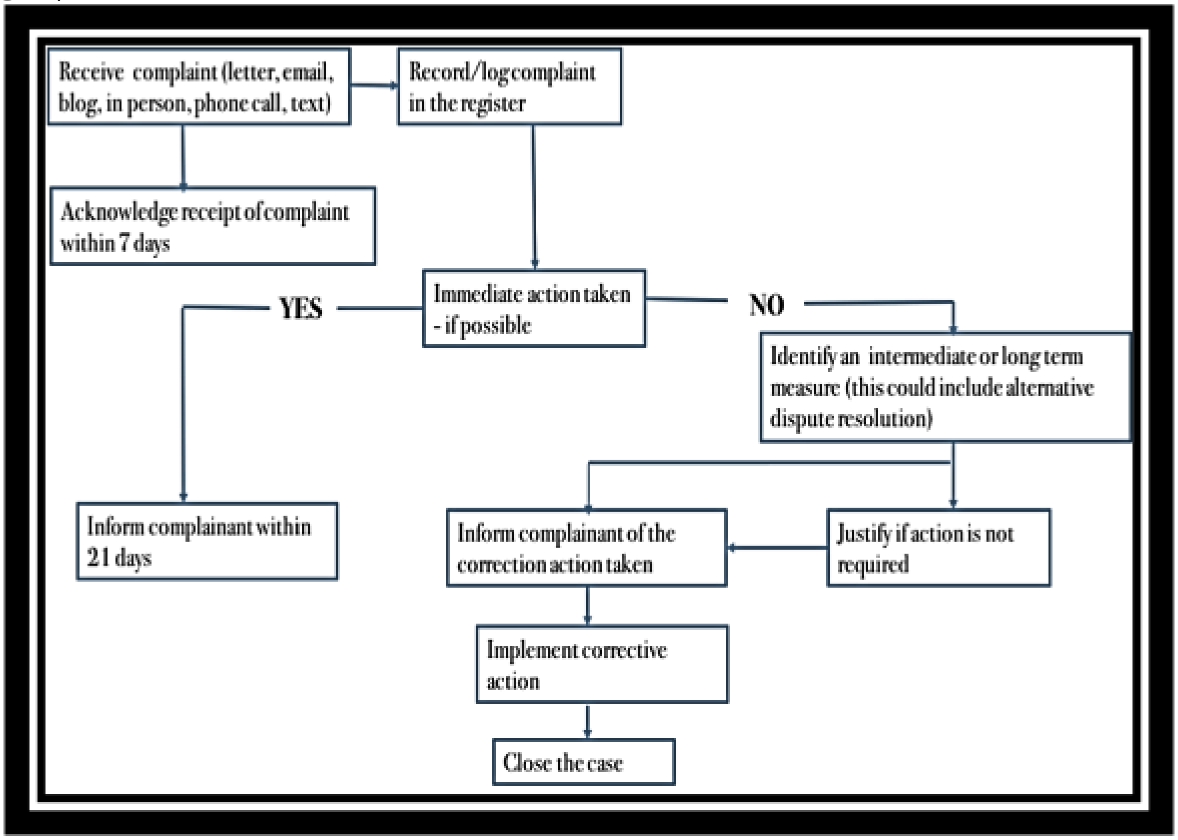

Figure 7-1: Practical Steps to be used in Addressing Grievances

7.7 Monitoring and Reporting back to stakeholder groups

182. Information disclosure and consultations are relevant throughout the entire life cycle of the Project. Project design has therefore been based on national-level consultations. Activities under each subcomponent will include further consultations prior to their commencement, to ensure a broadly inclusive selection of beneficiaries, transparency and accountability on project modalities, and allow community voices to form the basis for the concrete design of every intervention; consultations will continue throughout the project cycle.

183. The IPs implementing different sub-components of the Project will gather all comments and inputs originating from community meetings, GRM outcomes, and surveys. The information gathered will be submitted to the Environmental and Social Specialists in the PIU, to ensure that the Project has general information on the perception of communities, and that it remains on target. It will be the responsibility of the different IPs to respond to comments and inputs, and to keep open a feedback line to the communities, as well as the local authorities and State governments. Training on environmental and social standards facilitated by WB will be provided soon after the Project becomes effective to ensure that all the staff from the PIU, and the different IPs are equipped with the necessary skills.

184. The Implementing Partner (IP) will provide first feedback on the case to the aggrieved party within one week, if the case was not filed anonymously. Further feedback and action will depend on the nature of the case, and whether cases are decided upon within the respective IP. The IP will show to the PIU that action has been taken within a reasonable amount of time.

185. Most importantly, all cases filed need to be logged and monitored by the IP. The IP will analyze all complaints and feedback on a quarterly basis, and share a synthesis report of the analysis with the PIU.

7.8 Establishment of Grievance Redress Committees (GRC)

186. During the preparation and implementation of DRIVE, the Federal and the Regional Coordinating Offices will facilitate the establishment of Grievance Redress Mechanism Committees within communities in the locust-infested corridors traversed by the project. Five levels of GRC will be instituted, namely: The Federal PIU GRC, the Regional GRC, the District GRC, the Community GRC. At each project level, once reported, a case should be resolved within 5-7 working days or else escalated to the next level.

7.8.1 Level 1: Community Level GRC

187. Project beneficiaries will elect a three-member GRC through a democratic process to implement the grievance redress. Similarly, the beneficiaries at each sub-project site will elect their respective GRCs. The one-third gender rule will be applied to ensure ethnic balance and representation of women and youth. It is recommended that communities avoid electing individuals already in positions of local leadership (County/National Government representatives and other local political leadership). All group level GRCs for each value chain will hold further elections at Ward level to establish a Ward level value chain GRC comprising of three members.

7.8.2 Level 2: District GRC

188. The District GRC at the Ward level will elect one representative to form the integrated sub-county GRC. The one-third rule will be applied to ensure participation of VMGs and women.

7.8.3 Level 3: Integrated Regional Level GRC

189. The Regional GRMC at District level will elect one representative from each Sub-district to form a nine-member integrated Regional GRMC. These GRC will elect three of its members, who together with one representative from other District level institutions will form the Integrated Regional Grievance Redress Committee. The one-third rule will be applied to ensure the participation of VMGs and women.

7.8.4 Level 5: National GRC

190. The National PIU in collaboration with Regional PIUs will identify representatives from the implementing and executing agencies to form the national GRC. The Project GRM Team is composed of the Federal PIU, Communication Officer, Environment and Social Safeguards Officer, concerned Component Coordinator, and representatives of the Project Affected Persons (PAP).

7.9 Monitoring and Evaluation

191. The GRM shall provide for monitoring and evaluation. This is to ensure improvement of GRM e.g. quarterly review of quantitative indicators, annual review of grievance redress processes, and review of number of grievances reported and resolved (%). The DRIVE Social Safeguards Expert shall help to track and monitor the grievance resolution processes and their outcomes by different levels of the GRCs.

192. GRM Committees shall monitor the grievance redress process including implementation of decisions made, and check that redress is granted to PAPs in a timely and efficient manner. They will provide regular feedback to the complainants on the progress of the grievance redress process. Monitoring will track the progress of grievance resolutions and timeliness of grievance redress; follow-up grievances to ensure they are attended to; and document details of complaints received and the progress of resolutions. GRCs will provide information to project managers on the progress of implementation, and report actual and potential problems.

193. An evaluation system shall assess the effectiveness and impact of GRCs. Such evaluations will take place biannually, and their results shall contribute to improving the performance of the different GRCs, and provide valuable feedback to project management.

The following questions can be addressed in such evaluations:

1) How many complaints have been raised/% of which addressed/escalated?
2) What types of complaints have been raised?
3) What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, action being implemented, or resolved)?
4) How long did it take to solve the problem?
5) How many PAPs have used the grievance redress procedure?
6) What were the outcomes?
7) Are the GRM Committees effective in realizing the stated goals, objectives, and principles?
8) Are the GRM committees capable of responding to the range of grievances specified in their scope?
9) Are the GRM committees equipped with an adequate and diverse set of resolution approaches?
10) Have the GRM committees adopted measures to improve the resolution approaches, e.g., capacity building, consultation, with technical experts, etc.?
11) Are the GRM committees effectively integrated into overall project implementation?

194. The answers to the above questions will help project managers to track the trends of complaints; detect flaws in implementation; take timely corrective action; and make strategic changes where needed. They shall also provide valuable feedback about PAPs' satisfaction with the project, which could help executing agencies improve their reputation within communities. Those involved in M&E will liaise with media; monitor media reports; and provide feedback to project management for action or attention (as the case will require).

7.10 GRM Budget

195. A GRM shall have a realistic budget that sufficiently cover the costs of its operations such as facilitation, operationalization, disclosure, awareness campaigns, capacity-building training, field inspections, meetings, and documentation. GRM budget has been developed to guide the implementer in planning for the same. In this case, the table below presents the proposed Work Plan and Annual Budget per phase **(see Table 7-1).**

Table 7-1: Typical Annual GRM Work Plan and Budget for the project

S/No.	ACTIVITY	BUDGET (USD)
1	Awareness campaigns (No. of days, stationery, transport/fares, allowance)	15,000
2	Establishment of GRM Committees (	10,000
3	Capacity building sessions (	30,000
4	Disclosure (printing of materials, stationery, mapping of the disclosure points, allowance, transport/fares, etc.)	15,000
5	Field inspections (Allowances, transport/fares, stationery, etc.)	30,000
6	Management meetings (	25,000
7	Documentation/Reporting (lump sum annual)	5,000
8	Coordination and facilitation (lump sum-annual)	70,000
9	Contingency Cost	20,000
	Grand Total	220,000

8 Stakeholder Engagement / Consultation and Disclosure

8.1 Overview

196. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. For this reason, stakeholders' engagement must be started early in the project cycle because it guarantees the 'social license to operate' by signaling to communities and other local stakeholders that their views and well-being are considered important.

197. Project stakeholders are defined as individuals, groups and organizations, and/ or government entities whose interest or rights will be affected, directly or indirectly by Project, both positively and negatively, who may have an interest, and who have the potential to influence the Project outcomes in any way. Project stakeholders identified will be informed and consulted about the project and also in the implementation of the project.

8.2 Stakeholders Identification and Analysis

For the purpose of this SEP, "Stakeholder" refers to individuals, groups or other entity who:

(i) are affected or likely to be affected by the project (*project-affected parties*). For instance, pastoralists production groups targeted under Component 1 or parties who's operation are financed under Component 2; and

(ii) may have an interest in the project (*other interested parties*).

198. Stakeholders may also include project affected parties who, because of their particular circumstances, may be disadvantaged or vulnerable (Vulnerable/Marginalized Individuals or Groups – VMIG). They need to be identified to ensure that they are not excluded from the opportunity offered by the project.

199. This section identifies key stakeholders that will be informed and consulted about the Project during preparation. The key stakeholders for the Project Preparation activities will include, but not be limited to, the following:

8.2.1 Interested parties

- Pastoral groups and communities in ASALs[20]
- Village Savings and Loan Associations (VSLAs) supported under the Somalia Resilience Program (SomReP) and Building Opportunities for Resilience in the Horn of Africa (Boresha)

[20] A consultancy is being carried out to identify potential pastoral beneficiary groups in Ethiopia, Kenya, and Somalia. The outcome of this consultation will inform the guid ance on SEP prepared in coordination with the implementing agencies.

8.2.2 Other Interested Parties

National level:

- Somalia Ministry of Commerce and Industry
- Somalia Ministry of Livestock, Forestry and Range
- Central Bank of Somalia
- Somaliland Ministry of Trade
- Somaliland Bureau of Standards.

Local level:

- ASALs regional and district level local governments

Non-state:

- Somalia Chamber of Commerce
- Somaliland Chamber of Commerce
- Somalia Bureau of Standards (SBS)
- Somaliland Quality Control Commission (SQCC)
- Somali Microfinance Institution
- First Somali Takaful and Re-Takaful (FISO)
- SOMEAT
- Mogadishu Port and Berbera port authorities
- TAG Dairy
- Urbuntu-Agri
- HoA National Advisers to Focal Points
- Development partners and international organizations,
- Commercial Banks and MFIs: Galaxy International Bank,
- Local (Re)insurers.
- Mobile network providers.

8.2.3 Vulnerable/Marginalized Individuals or Groups

200. VMIG are those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend. VMIG may include but not limited to the following:

- Minority clans and groups
- Older persons;
- Illiterate people;
- Persons with disabilities (PWDs);
- Persons in remote rural areas or areas characterized by violence that are bereft of social services and amenities
- Female-headed households;
- Internally Displaced People (IDP);
- Unemployed youth;
- People living in informal settlements;
- People living on the streets; and
- Urban poor.

201. The Project will also ensure appropriate measures are in place to ensure that information is available in Somali or any other predominate language identified by the beneficiaries. VMIG within the communities affected by the project will be further confirmed and consulted through dedicated means, as proposed in the SEP. .

202. PIU will ensure members of these vulnerable or disadvantages groups are participating effectively and meaningfully in consultative processes and that their voices are not ignored. This may require specific measures and assistance to afford opportunities for meetings with vulnerable groups in addition to general community consultations. For example, women-only consultations will be held. Similarly, separate meetings may be held with young people, persons with disabilities or with ethnic or other minority groups. Further, it is important to rely on other consultation methods as well, which do not require physical participation in meetings, such as social media, SMS, or radio broadcasting, to ensure that groups that cannot physically be present at meetings can participate, especially during the pandemic. In view of promoting gender equality, it is most important to engage women's groups on an ongoing basis throughout the lifetime of the project. Women voicing their concerns and contributing in the decision-making process on issues such as community infrastructure should be encouraged, especially in various fora that predominantly consist of men. PIU IS similarly encouraged to deploy female staff, in particular where staff interfaces with community members.

203. The approach to communicating with pastoralists and other Historically Underserved Traditional Local Communities will include culturally appropriate engagement processes for information campaigns. GRM will be culturally appropriate and accessible for IPs, considering their customary dispute settlement mechanism. This will include targeted meaningful consultation, including identification and involvement of communities and their representative bodies and organizations; culturally appropriate engagement processes; providing sufficient time for decision making processes; and allowing their effective participation in the design of project activities or mitigation measures that could affect them either positively or negatively.

204. To ensure that the vulnerable are not excluded or the project does not exacerbate the already vulnerable situation, the PIU will conduct screening and community consultation at each sub-project area and confirm the presence or absence of IP/Sub-Saharan Historically Underserved Traditional Local Communities as per ESS7 to determine the applicability of the standard. If ESS7 groups are found in implementation areas, then IPPPs shall be prepared.

8.3 Stakeholder Engagement Program

8.3.1 Purpose and Timing of Stakeholder Engagement Program

205. The purpose of the SEP is to present a strategy for engaging stakeholders of the project to ensure that they understand the project and can provide their feedback and input into the project. This SEP describes the nature of the anticipated stakeholders as well as their information requirements, timing, and methods of their engagement throughout the lifecycle of the project.

206. During the Project Preparation phase, MoF will engage stakeholders as early as possible and will continue the engagement throughout the implementation of the Project Preparation activities, particularly during surveys and baseline data collection, and preparation of the Environmental and Social Management Framework (ESMF), Gender-Based Violence (GBV) Assessment, and project SEP. This process will continue under the Project, starting from planning, mobilization, implementation stages, and until the Project is eventually closed out. At this stage the decisions on public meetings, locations, and timing of meetings have not yet been made. The stakeholders will be notified before and during the implementation of the Project Preparation activities. However, the nature and frequency of follow up consultations will differ depending on the project components and activities in line with the ESCP.

8.3.2 Information to be disclosed

207. MoF will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. MoF will provide stakeholders with access to the following information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design:

(i) The purpose, nature and scale of the project;
(ii) The duration of proposed project activities;
(iii) Potential risks and impacts of the project on local communities, and the proposals for mitigating these, highlighting potential risks and impacts that might disproportionately affect VMIG and describing the differentiated measures taken to avoid and minimize these;
(iv) The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate;
(v) The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and
(vi) The process and means by which grievances can be raised and will be addressed.

Specific objectives of information disclosure for each level of consultation has been highlighted in Table 8-1 below with a summary of the issues.

Table 8-1: Engagement Activities during Project Preparation

Engagement Activity	Objective	Targeted Stakeholders	Key issues raised	Time
National stakeholder consultations	Collect views on the design and implementation arrangement of the project, environmental and social risks, mitigation measures, grievance redress mechanisms, and SEP	Representatives of national Government and line ministries	Project design Identification of potential beneficiaries . Project fiduciary processes. Environment and social risk management, capacity building	September–December 2021
Federal Members States	Collect views on the design and implementation arrangement of the project, environmental and social risks, mitigation measures, grievance redress mechanisms, and SEP	Representatives of federal governments and line state ministries	Project design Identification of potential beneficiaries. Project fiduciary processes. Environment and social risk management, capacity building	September–December 2021
District and Local Government Stakeholder consultations	Collect views on the design of the project, environmental and social risks, mitigation measures, grievance redress mechanisms and SEP	District / Local government officials	Identification of potential beneficiaries	September–December 2021

Engagement Activity	Objective	Targeted Stakeholders	Key issues raised	Time
Community-level Stakeholder consultations	Collect views lessons learned in the previous or related project, challenges, social risks, and their mitigation measures	Community members, and extension workers	Project design Social and environmental risks and impacts. Social Assessment Gender-based violence prevalence rates in the community. Gender assessment.	September – December 2021

208. Stakeholder information disclosure needs vary depending on principle occupation and locality and include, but are not limited to, language needs and capacity building training. These specific needs have been shown in Table 8-2 below. However, through further consultations and engagements with the community, more stakeholder needs will be identified, and the table updated accordingly.

Table 8-2: Summary of Stakeholder Needs for information disclosure

Stakeholder Group	Key characteristics	Language needs	Preferred notification means (email, phone, radio, letter)	Specific needs (accessibility, Large print, child care, daytime meetings)
National-level institutions	NA	English	E-mail	Daytime meetings
Federal -level government officials, assembly members and others	NA	English	Meetings, email	Daytime meetings
Non-state	NA	English or	E-mail, meetings,	Day-time

Stakeholder Group	Key characteristics	Language needs	Preferred notification means (email, phone, radio, letter)	Specific needs (accessibility, Large print, child care, daytime meetings)
national actors		Somali	social media	meetings
Traditional leaders	Mix of semi-illiterate and literate	English or Somali	Community meetings with translator, & radio	Graphic and workshops on process
VMIG	Mix of semi-illiterate and literate	English or Somali	Community meetings with translator, & radio	Graphic and workshops on process

209. A precautionary approach will be taken to the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. Table 2 above has highlighted some of the considerations for selecting channels of communication, in light of the current COVID-19 situation.

8.3.3 Proposed Strategy for Information Disclosure

210. The SEP will be disclosed on the Bank's external website and MoF External Website. Furthermore, information before and during the project implementation will be made available through short reports and meetings with translations in the local languages in the rural communities where project activities will be implemented. Information will also be transmitted through local community radio stations in appropriate local languages.

211. The MoF will be responsible for the project launch and disclosure of the SEP and Grievance Redress Mechanism (GRM) so that the community is made aware of channels to bring out their complaints. These meetings will be in the form of Focus Group Discussions; all views and feedback will be recorded. Local authorities are key in the mobilization of the community, it will, therefore, be important to hold meetings with them once issues are emerging in the community. The ESMF, GRM and project SEP will be disclosed in accordance with national laws, while meeting the WBG's ESF requirements. The instruments will be publicly disclosed on MoF website, while hard copies will be available at the MoF. for interested parties to access, review, and provide comments as necessary.

8.3.4 Proposed Strategy for Consultation

212. During the Project Preparation, the first step will be to establish protocols for consultation during the life of the Project Preparation activities and the main project, under the development of the instruments ESMF and project SEP. Stakeholders will be asked to provide feedback on the appropriate protocol for consultation. This will be captured and validated. The validated protocols will guide consultations throughout the project.

213. ZEP Re (implementer for Component 1), and the existing PIU within MoF (implementer for Component 2), will be required to conduct stakeholder engagement with project beneficiaries.

8.3.5 Proposed Strategy to Incorporate the View of Vulnerable/Marginalized Individuals or Groups

214. Consultations with VMIG groups will take place under the Project Preparation in the development of the ESMF, and the project SEP. Otherwise, it will be carried out through the main project's SEP.

8.4 Dedicated consultations with Vulnerable/ Marginalized Individuals or Groups

215. The information will be disclosed Traditional Local Communities in somali language and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility).

8.5 Resources and Responsibilities for implementing stakeholder engagement activities

8.5.1 Resources

216. Both human and financial resources are required for the successful implementation of the SEP for the Project Preparation activities and as well as the Project. The Project Implementation Unit (PIU) will hire competent and qualified Environmental and Social Development Specialists who will be responsible for ensuring effective implementation of the SEP and will report to the project coordinator who will share said report with the coordinator. The ToRs for these specialists will be drafted during the Project Preparation, and the recruitment will be finalized once the Project is approved. The budget for the implementation of the SEP will be financed by resources from the Project Preparation under the amounts allocated for operations and workshops.

8.5.2 Management Functions and Responsibilities

217. To ensure that the SEP is effective, the MoF will maintain a PIU with qualified personnel who will be responsible for the day-to-day implementation of the Project Preparation activities, including implementation Project Preparation activities reflected in this SEP. As an activity under the Project Preparation, the PIU will hire qualified Environmental and Social Safeguard Specialists to oversee the implementation of the SEP.

8.6 Disclosure of Information

The World Bank policies require that environmental reports for projects are made available to project affected groups, local NGOs, and the public at large. There is however no limitation as to the extent and scope of the disclosure. After the national stakeholders' consultation workshop, and the ESMF will be disclosed on the Ministry of Finance (MoF) website and the link shared with the World Bank. A summary of the framework will also be advertised in the main local dailies.

The implementing ministry (MoF), in collaboration with other line agencies, will make available copies of the ESMF in selected public places for information and comments, as required by the law. There will also public notice in the media (newspaper or radio announcement or both, national and federal states stations) providing a brief description of the Project; a list of venues where the ESMF report is on display and available for viewing; duration of the display period; and contact information for comments.

8.7 Outcome of Stakeholder Consultation

218. Over 150 people participated in the meeting including representatives from the Ministry of Finance, Ministry of Commerce & Industries, Ministry of Livestock Forestry & Range, Ministry of Labor & Social Affairs, Central Bank of Somalia, Somali Chamber of Commerce, Somali Bureau of Standards, delegates from Federal Member States, Benadir Regional Administration, Mogadishu Port Authority, Gargaara Company, Takaful Insurance, Commercial Banks, Agro Pastoral Companies, Persons with Disabilities, Women, Youth and Development Partners who joined the meeting online.

219. On November 27-28, 2021 a stakeholder/public consultation for DRIVE Project was held at Jazeera Hotel in Mogadishu as project preparatory activities. The meeting officially started with statements and presentations from key meeting representatives. Subsequently, participants separated into focus groups for discussions and brainstorming to introduce their views towards the project.

8.7.1 Statements and Presentations from the Key Informants

220. SCALED-UP PIU Coordinator Abukar Osman moderated the consultation sessions and welcomed participants to the stakeholder engagement meeting. He noted the purpose of the engagement is to build a consultative relationship around the DRIVE project, to assess the level of interest that stakeholders have, and to understand the views of the stakeholders particularly in relation to environmental and social aspect of the project.

a) Director General of Ministry of Finance Saleiman S. Umar officially kicked off the consultation and stated that DRIVE project will assist enhancement of the pastoral societies and it involves financial protection for their herds as the livestock is the backbone of Somalia’s GDP. The largest Somali exports is our livestock therefore cultivating this trade with value chains and financial products is essential. The climate shock recently devasted our livestock and our Prime Minister (PM) recently declared a state of emergency as a result of this shock. This project must be launched immediately to respond to this shock and to respond to other potential shocks.

b) Director General of Ministry of Commerce and Industries Abdiaziz Ibrahim Adan welcomed DRIVE project and expressed benefits of pastoral communities to protect their livestock from drought crisis. He also mentioned the contribution of this project to the development of the economy and improve export of livestock and livestock products through connecting international markets.

c) Director General of Ministry of Livestock and Forestry Range Mohamed Omar remarked the livestock sector has significant social and economic importance in Somalia. More than half of the population living in the rural areas are directly and indirectly depend on livestock and this sector is the largest contributor to Somalia’s economic growth and livelihoods. He emphasized the recent significance of this project as the catastrophic droughts have recently wiped out large percent of the pastoralists livestock.

d) Chief Executive Officer (CEO) of Gargaara Suleiman Dualeh welcomed the DRIVE project. The insurance provision to the pastoral communities and the value chain for the communities is of huge importance to increasing the livelihoods value of the Somali pastoral communities. The project touches the lives of our societies, create opportunities for youth and enhances the income of our people. It is also a timely project coming at a time when the droughts have ravaged our livestock and would have been prevented through insurance and value chain activities.

e) Director General of Somali Bureau of Standards (SBS) Adan H. Barre confirmed that SBS are well aware of the project. Insurance for our livestock which is the backbone of economic development of the country is something that SBS welcomes and as well as the value chain activities that will also and facilitate our business men and women to engage international markets. He stated that SBS will provide certificate of verification on both imports and exports that assist pastoralists to gain international recognition.

f) Garad Farah from Mogadishu Port Authority stated that Mogadishu port facilitates pastoralists to export livestock from the port and connect to the international and regional markets, he also welcomed DRIVE project and mentioned this project contributes national economies.

g) Prof. Osman Abdullahi an environmental and social safeguard consultant of Somalia Capacity Advancement, Livelihoods and Entrepreneurship, Through Digital Uplift Program (SCALED-UP) PIU delivered a presentation on the overview of the DRIVE project and highlighted the World Bank environmental and social framework policies required for Component Two of the project.

h) Benjamin Kamanga from Zep-Re a COMESA instituted company that promotes trade in insurance and reinsurance trade provided a significant presentation on the role of Zep-Re in DRIVE project.

i) Banerjee Rupsha and Njoki Kahiu from International Livestock Research Institute (ILRI) presented an essential and beneficial study about technical and socio-economic landscape for product design in Puntland. After that Abdirahman B. Dubad from SomRep, comprehensively explained this study into Somali language in order for participants to get a deeper understanding.

8.7.2 Focus Group Discussions

221. The outcome of Focus Group Discussions is captured on Table 7 below:

Table 8-3: Outcome of Focus Group Discussions

Key themes to cover	Responses
Perception about the project	The project is a useful solution for the drought and other natural disasters that repeatedly affect pastorals, it also lifts up the living standard of those beneficiaries, similarly this will ease trade for pastorals for both domestic and internationally. The project creates employment opportunities, stimulates the volume of collection of national revenues and, to the economic growth of the country. In general, security is the major obstacles or impediments to the success of the project. Lack of human capital and experts, lack of collaboration between stakeholders, including national and subnational institutions, the timing of the project should be consistent with the inventive planning of the project. Poor management and lack of transparency will be a negative outcome for the project. These risks be prevented or mitigated to set up a joint committee whose principal task would be to create a bridge between recipients and donors and also receive grievances and complains from the pastoralists to resolve. Establishment Independent monitoring and evaluation team, holding a regular meeting between stakeholders, putting in place communication channels.
Exclusion during project design and implementation	Internally Displaced Person (IDP) groups are trapped in situations where they depend on external aid which are often maintained by local Non-Government Organizations (NGOs) and some international organizations. Often tension is reported between IDPs and their host communities in many parts of the country, this cause exclusion of either in public engagement or benefits of the project, therefore it is important the federal member states to recognize the rights of IDPs. Persons with disabilities are one of the most marginalized segments in the society. Most of them do not have access to education, training and thus remain deprived of gainful employment. Therefore, People With Disabilities are more likely to be excluded from participation and benefiting of the project, however, creating adequate opportunity of development programs and participating the project design and implementation is more effective and helpful to upgrade their lifestyle.
Stakeholder engagement	Creating an understandable environment for using social mobilizers to make outreach to the remote villages, would be cooperative way to consult with community leaders and the pastoralists to inform the effectiveness of the project to their society. Also, media (radio programs) can be used to educate how insurance works through Takaful companies and livestock associations to influence pastoralists to make their voices heard. Therefore, it is necessary to provide capacity building training for

Key themes to cover	Responses
	project staff who will reach remote villages for engagement with rural and nomad people. However, the country is currently in a state of drought, the first step is to recover from the drought that has affected many parts of the country, then the project could be implemented and still effectively reach the people affected by the drought to comprehend insurance program to protect their livestock from possible droughts in the coming years. Involvement of the target beneficiaries of this project is needed because most of pastoral society are illiterate and they live in rural areas that make difficult to get accurate information for the implementation of this project.
Labor-related risks	Labor law of the country specifies 15 years old as the minimum working age, and provide some framework of legal protection against child labor, equal payment and working conditions. However, rural areas children and women are main guardians and keepers of livestock such as goats, caws and sometimes camels. The government should conduct an investigation of child labor to eliminate poor working conditions for children.
Socio-cultural beliefs	It is possible that the religious and traditional leaders will have an objection to the project because our society has no idea about the insurance system, and they believe that it is against religion and Somali cultural. It requires understanding of insurance and how it works, and the importance of the project to protect livestock against drought shocks. It is also better to use Takaful companies to sit with the religious leaders and explain the effectiveness of insurance to pastoral livestock.
Security issues and conflicts	The project is exposed to great security risk due to lack of strong government presence in all regions of Somalia. For instance, most of Jubbaland districts are not in the hands of the government, same as Southwest and Galmudug, there are many districts in the hands of al-Shabaab and it will be difficult to implement the project unless the government authority controls and take responsibilities of those regions. Failure to get the expected result in some areas which is being controlled by specific armed clan militia, furthermore, kidnaping government staff and ask them to spend large ransom of money is the most security challenge that may face the implementation of the project. It is hard to continue exchange of trade during the conflicts, so the pastoralist pay money for bribe to the armed groups in order to move their herds to the markets, as

Key themes to cover	Responses
	livestock are being transported through conflict zone, this causes to stopover livestock trade in conflict areas and shift into new market.
Gender-Based Violence (GBV)	Although women who live in rural areas play crucial role in the maintenance of household livelihoods, they have less access to productive resources and employment opportunities. However, they meet threats among the nomadic society which men are the head of the family. There are police stations which could report GBV related cases in the nomadic and non-nomadic pastoralist but the community does not allow women to file complaints, and they force them to hide their problems. However, the incident is usually traditionally solved via clan elders. The project should support the protection of women and not violate their rights among the society. Provide schools for their children and deliver health services.
Occupational Health and Safety	In the face of this unprecedented pandemic, ministry of health is working with World Health Organization (WHO) to support Corona Virus Disease-2019 (COVID-19) response. Across the country, communities have been hit hard by the sudden spread of COVID-19. Though there is not exact data of nomadic people who affected the COVID-19. There has been a lack of consistency in national and sub-national policy to guide pastoralists to avoid transmission of and protect COVID-19. The appropriate measures to prevent the spread of COVID-19 should take and fulfill advice suggested by the health workers such as cleaning and washing hands, wearing a mask when physical distance is not possible, reduce public gatherings, and develop a campaign of vaccinating rural communities.
Grievance mechanisms	The most efficient way the beneficiaries could raise their grievances is to establish a committee from the society and project implementers to register the aggrieved individual and solve complaints. In case a grievance not addressed at the committee, the project should create various channels that registers grievances such as phone line or website.
Recommendations	Organize occasional workshops every three to four months, share experiences, information and knowledge with stakeholders. Create more supervisors who will follow up on the project and ensure that things are done properly and wisely. Create a pastoralist agent or pastoralist association to record basic information that will make easier for government to monitor. Insurance payment should be reasonable as pastoralists may find it difficult to persuade insurance system. Deeply assess the culture of the community if there is an impact on implementation of the project. Increase pastorals knowledge and skills in order to understand insurance system.

Key themes to cover	Responses
	Build the infrastructure that facilitate regional and international trade. Establish feed lot farming and drill wells to overcome water shortage in remote villages. Develop pastoral identification system which helps selection of the appropriate beneficiary.

8.7.3 Closing Statements

1. Sonia Plaza from World Bank provided a comprehensive overview of DRIVE project and its contribution to economic growth through protection of pastoralists against the drought shocks. The insurance mechanism and the livestock value chain for regional trade, supporting the improvement of quality infrastructure and access to international markets. Sonia stated the WB will provide technical assistance and capacity building to Ministry of Commerce & Industry, Ministry of Livestock, Somali Bureau of Standards and institutions that working on digitalization of certificates, visibility studies and testing labs. She also mentioned the WB are working with the Central Bank of Somalia to develop a roadmap insurance and reinsurance of livestock including sharia compliance and takaful regulations.

2. Hon. Abdulkadir Sharif Sheikhuna State Minister of Commerce and Industries thanked the WB for their developmental projects to Somalia. He highlighted the importance for the DRIVE initiative protecting the pastoral communities' livestock against drought. He was finally thankful to the participants for their enthusiasm and openness to contribute experiences and valued ideas to the consultation.

9 Conclusions and Recommendations

222. The proposed project has potential to significantly increase the income of local pastoralists households and improve their livelihoods by protecting the pastoralists from the shocks of drought on their livestock and promoting livestock production. The project will support local pastoralist communities by:

(a) promoting equal opportunity of women through its financial education and outreach programs (under Component 1) that address the existing gender gaps in the project target communities. Likewise, the seed capital (under Component 2) gives special consideration to pastoral households, women and youth excluded from access to formal credit service.
(b) Encouraging pastoralists to build up savings to address moderate drought years, and to invest in a drought index insurance product providing protection for severe drought years.
(c) Providing rapid insurance payouts at the onset of a drought, which are faster than humanitarian assistance and allow pastoralists to keep their animals alive. Enable the use of satellite technology that monitors the conditions of pasture on the ground such that when the level of pasture falls below a certain level, the insurance payout is triggered automatically, and pastoralists receive payouts directly through mobile money.
(d) Promoting business activities with significant impact for the women's economic empowerment in the pastoral and agro-pastoral areas. Increase of women's income through intervention of milk value chain which the women in the pastoral areas engage in as the main actors: women's access to seed capital from the DRIVE project and facilitation of access to credit from financial institutions, scale-up of such businesses and provide jobs and increase of income for the local women, and
(e) Increasing the knowledge of the pastoral and agro-pastoral households' financial literacy for better household saving habit and income management for productive economic activities.

223. DRIVE project in Somalia will support to build the climate resilience of pastoralist and promote livestock value chains. The DRIVE project is expected to have more positive than negative environmental and social impacts. Since the project will not involve any civil works, the envisaged environmental and social impacts include, pressure on local resources, GHG emissions, water and air pollution, community health and safety risks, waste management, stakeholder engagement issues, and possible GBV/SEA issues. These envisaged environmental and social risks can be mitigated. However, this will entail incorporating all the requisite mitigation measures and adhering to the requirements of the current ESMF and other safeguards instruments. The Final benefits of this project to the nation will, by far outweigh potential negative effects.

10 References

a) Good Practice Note Addressing Gender Based Violence in Investment Project Financing Involving Major Civil Works, 2018.

b) Preventing Sexual Exploitation and Abuse. (n.d.). Retrieved June 24, 2021, from https://www.un.org/preventing-sexual-exploitation-and-abuse

c) Provisional Constitution of the Federal Republic of Somalia, 2012.

d) The Somali Penal Code of 1962.

e) The Somalia Agricultural Land Law 1975.

f) The Somalia Labour Code of 1972.

g) The Somalia National Environmental Policy 2015.

h) The Somalia National Gender Policy 2016.

i) UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials firearms.

j) World Bank Group (2008) The Voluntary Principles on security and Human Rights 2008.

k) World Bank Group (2020) ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/Civil Works Projects, issued on April 7, 2020.

l) World Bank Group (2020) Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, issued on March 20, 2020.

m) World Bank Group. Environment and Social Framework Safeguards interim note: COVID-19 considerations in construction/civil works projects, 2020.

n) World Bank Group. Environmental, Health, and Safety Guidelines. General EHS Guidelines, April 30th, 2007.

o) World Bank Group. Good Practice Note – Assessing and Managing the Risks and Impacts of the Use of Security Personnel, 2018.

11 Annexes

11.1 Annex I-A: Environmental and Social Screening checklist

224. **E & S Screening Form**: This form will be filled during identification of project activities by the Environment and Social Specialist in Project Implementation Units (PIU) to screen for the potential environmental and social risks and impacts of a proposed subproject. It will help the PIU in i) identifying the relevant Environmental and Social Standards (ESS), ii) establishing an appropriate E&S risk rating for these subprojects, and iii) specifying the type of environmental and social assessment required, including specific instruments/plans. The completed forms will be signed and record kept.

This form will allow the PIU to form an initial view of the potential risks and impacts of a subproject**. It is not a substitute for project-specific E&S assessments or specific mitigation plans.**

Subproject Name	
Subproject Location	
Subproject Proponent	
Estimated Investment	
Start/Completion Date	

Questions	**Answer**		**ESS relevance**	**Due diligence / Actions**
	Yes	**No**		
Does the subproject involve major civil works including new construction, expansion, upgrading or rehabilitation of existing infrastructures?			ESS1	ESIA/ESMP, SEP
Does the subproject involve long-term, permanent and/or irreversible adverse impacts (e.g. loss of major natural habitat)?	*		ESS1	ESIA/ESMP, SEP
Does the sub project involve production or trade in any product or activity deemed illegal under the Recipient's laws or regulations or ratified international conventions and agreements	*		ESS1, ESS3	ESIA/ESMP, SEP
Does the sub project involve the production or trade-in pesticides/herbicides subject to international phase-outs or bans.	*		ESS3	ESIA/ESMP, SEP
Does the sub-project activities resulting or anticipated to result in permanent or temporary physical or economic displacement	*		ESS1	ESIA/ESMP, SEP
Does the sub-project involve land acquisition and/or restrictions on land use?	*		ESS5	SEP
Will the activities affect lands or rights of VMGs or other vulnerable minorities like IDPs?	*		ESS5	SEP

Questions	Answer		ESS relevance	Due diligence / Actions
	Yes	No		
Does the sub-project activities curtail workers' fundamental rights i.e. forced labour, child labour?	*		ESS2	LMP
Is the sub-project associated with generation of the potential hazardous wastes?			ESS3	ESIA/ESMP, SEP
Is there a sound regulatory framework and institutional capacity in place for the management and control of waste generated by project activities?			ESS1	ESIA/ESMP, SEP
Does the sub-project have an adequate system in place (capacity, processes and management) to address waste?				HASP (Health and Safety Plan) & Waste Management Plans
Does the sub-project involve recruitment of workers including direct, contracted, primary supply workers?			ESS2	LMP,/SEP
Does the sub-project have appropriate OSH procedures in place, and an adequate supply of PPE (where necessary)?				HASP (Health and Safety Plan)
Does the sub-project have a GRM in place, to which all workers have access, designed to respond quickly and effectively?				SEP/LMP
Does the sub-project involve use of security or military personnel during construction and/or operation activities?			ESS4	SecMP, SEP
Will the activities have high probability of causing serious adverse effects to human health and/or the environment?	*		ESS4	ESIA/ESMP, SEP
Is the sub-project located within or in the vicinity of any ecologically sensitive areas?			ESS6	ESIA/ESMP, SEP
Are there any indigenous groups (meeting specified ESS7 criteria) present in the sub-project area and are they likely to be affected by the proposed sub-project negatively or positively?	*		ESS7	Sub-Saharan Historically Underserved Traditional Local Communities: Indigenous Peoples Planning Framework
Does the sub-project require Free Prior Informed Consent (FPIC)?	*		ESS7	
Is the sub-project located within or in the vicinity of any known cultural heritage sites?	*		ESS8	ESIA/ESMP, SEP

Questions	Answer		ESS relevance	Due diligence / Actions
	Yes	No		
Does the project area present considerable Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) risk?			ESS1	ESIA/ESMP, SEP

∗ The exclusion list of the sub-projects. If any of these parameters are "Yes", the sub-project is excluded from financing under the project.

Conclusions:

1. **Proposed project is eligible for financing under the project criteria.**

   ………
   ………

2. **Proposed Environmental and Social Risk Ratings (High, Substantial, Moderate or Low). Provide Justifications.**

   ………
   ………

3. **Proposed E&S Management Plans/ Instruments.**

   ………
   ………

Certification

Reviewed and approved by			
Environment Specialist **Name:**		**Social Specialist** **Name:**	
Date	**Signature**	**Date**	**Signature**

11.2 Annex II: List of Meeting Attendees

No	Name	Gender	Institution
Virtual Participants			
1.	Abdulkadir Sharif Sheikhuna	M	State Minister – MoCI
2.	Saleiman S. Umar	M	DG – MoF
3.	Mohamed Omar	M	DG – MoFLR
4.	Sonia Plaza	F	World Bank
5.	Thibault Bouessel du Bourg	M	World Bank
6.	Jaafar Mohammad	M	World Bank
7.	Haroub Ahmed	M	World Bank
8.	Qhelile Ndlovu	F	World Bank
9.	Evie Calcutt	F	World Bank
10.	Sammy Ratemo	M	World Bank
11.	Benjamin Kamanga	M	Zep-Re
12.	Banerjee, Rupsha	F	ILRI
13.	Njoki Kahiu	F	ILRI
14.	Kelvin M. Shikuku	M	ILRI
15.	Nishant Das	M	WVI
16.	Abdul Qadir Rafik	M	UNDP
17.	Said Khaled	M	FAO SO
18.	Laura Rio	M	UNDP
19.	Patrick Mutinda	M	DRC
20.	Nimo Jirdeh	F	UNDP
In-Person Participants			
21.	Abdiaziz Ibrahim Adan	M	DG – MoCI
22.	Adan Hassan Barre	M	SOBS
23.	Suleiman Dualeh	M	Gargaara
24.	Abukar Osman	M	PIU
25.	Prof. Osman Abdullahi	M	PIU
26.	Abdimajid Omar	M	PIU
27.	Zakariye A. Ahmed	M	PIU
28.	Mohamed A. Said	M	PIU
29.	Mohamed Hussein	M	PIU
30.	Ahmed H. Mohamed	M	PIU
31.	Abukar Sayid Ali	M	PIU
32.	Ahmed Abdirahman	M	SomRep
33.	Abulkadir M. Abdi	M	My Bank
34.	Abullahi Mohamed Abdi	M	MOHADMA
35.	Omar Hussein	M	BRA
36.	Ahmed Omar Abdullahi	M	BRA
37.	Abdullahi M. Barre	M	Dahardher Agritech
38.	Sharif Nur Yusuf	M	IBS Bank
39.	Garad Farah	M	Mogadishu Port Authority
40.	Mohamerd Nur	M	Mogadishu Port Authority
41.	Lul Mohamed Hassan	F	BRA
42.	Ibrahim Adan Ali	M	MoCI – Southwest
43.	Abdi Dahir Abdi	M	MoCI – Fedaral
44.	Abdillahi Mursal Hussein	M	MoCI – Puntland
45.	Zakarie Sharif Ahmed	M	MoCI – Galmudug

Virtual Participants			
No	Name	Gender	Institution
46.	Yasin Abdinasir Ali	M	MoCI – Federal
47.	Abdullahi Hassan	M	Barkhadle Group
48.	Ahmed Ali Mohamed	M	Takaful Insurance
49.	Abdullahi Ibrahim Osman	M	MoCI – Hirshabelle
50.	Hassan Ahmed Osman	M	MoF – Hirshabelle
51.	Hassan Dhi'isow Olow	M	MoLFR – Hirshabelle
52.	Ali Hassan Muse	M	SOWELPA – Livestock Association
53.	Ahmed Takow	M	BENALPA – Livestock Association
54.	Mustaf Sheikh Ali	M	University Lecturer
55.	Mohamed Adan Somane	M	MoF
56.	Safiya Ahmed Ibrahim	F	SIMAD University
57.	Ayan Ilyas Ahmed	F	Women Business Association
58.	Abdulkadir Dahir Farah	M	Dunya Veterinary
59.	Mohamed Abdi Elmi	M	Isra Consultaning Group
60.	Khadija M. Hussein	F	HSS – MoLFR
61.	Dr. Adan Hussein Derow	M	MoLFR
62.	Hassan Ahmed Hassan	M	Chamber of Commerce
63.	Sundus Abdullahi Hussein	F	MoLSA
64.	Hassan Mohamed Hassan	M	Daryeelka Xoolaha
65.	Abdullahi Ali Farah	M	MoLFR – Jubaland
66.	Abdirizak Ali Rage	M	CAHW
67.	Abdirizak Jama	M	Jubaland Meet Company
68.	Dr. Shukri Mohamed Yusuf	M	MoLFR – Jubaland
69.	Khadija Osman	F	
70.	Abdirizaq Sama	M	JMDC
71.	Mohamed H. Mudey	M	Fiso Takaful
72.	Abdihakim Mohamed	M	Fiso Takaful
73.	Abdusalam Mohamed	M	Puntland State
74.	Abdulkadir Abdi	M	CERELPA – Livestock Association
75.	Abdiwali Mohamud Dhaqane	M	Daaqa Agro
76.	Ahmed Ali Hassan	M	MoF
77.	Abdulkadir Adan	M	MoLSA
78.	Osman Hassan Afrah	M	Salro
79.	Zakariye Ibrahim Isse	M	Daaqa Agro
80.	Isse Farah	M	MoF
81.	Abdirizaq Nur Yusuf	M	CBS
82.	Mohamed Ismail Said	M	CBS
83.	Adan Isaq Adan	M	Hormud Telecommunication
84.	Maria Mohamed Ali	F	IBS Bank
85.	Abas Sheikh Ali	M	FAO
86.	Isse Mohamed Isse	M	Baraka Insurance
87.	Feisal Mohamed Hashi	M	MoF
88.	Yusuf Abdirahman	M	Som Milk
89.	Adan Abdi Osman	M	COOPI Organization
90.	Majido Adan Mohamed	F	COOPI Organization
91.	Ismahan Hassan Mohamed	F	MoLFR
92.	Hussein Amin	M	SomRep

Virtual Participants			
No	Name	Gender	Institution
93.	Abdiaziz Ibrahim Ali	M	MoCI
94.	Mohamed Jama	M	MoF
95.	Farhiyo Hassan Adan	F	BRA
96.	Mohamed Ali	M	Premier Bank
97.	Mowlid Abdulahi	M	MoLFR
98.	Roble Ibrahim Omar	M	Amal Bank
99.	Hussein Abdi Warsame	M	Banadir University
100.	Iqra Ali Abdirahman	F	Banadir University
101.	Khadija Abdi Hassan	F	IBS Bank
102.	Abdinasir Ali Omar	F	MoF
103.	Abdullahi Ali	M	MoLSA
104.	Rashid Omar	M	Premier Bank
105.	Masud Tahlil	M	SIMAD University
106.	Abdullahi Abdulkadir	M	OOG Dairy
107.	Abdirizaq Yusuf Abdirahman	M	OOG Dairy
108.	Abdullahi Tahlil	M	SICPA
109.	Layla Ali Mohamed	F	Women Business Associations
110.	Hani Salad Matan	F	Women Business Associations
111.	Sahra Abdirizaq	F	Women Business Associations
112.	Mohamed Bashir	M	Malab Dairy
113.	Qali Ahmed Haji	F	
114.	Mahdi Abshir Omar	M	PWDs
115.	Aisha Ismail	F	Gargaara
116.	Burhan Siad Salah	M	SICPA
117.	Fardowsa A. Ali	F	Women Business Associations
118.	Abdulkarim Abdulle Yusuf	M	Someat
119.	Nadar Hute Muhiyadin	F	Womern Business Associations
120.	Mohamed H. Abdi	M	
121.	Fardowso Abdirahman	F	Abraar Company
122.	Nasir Abdi	M	UNDP
123.	Abdifatah Mohamed Ibrahim	M	Dunya Veterinary
124.	Amal Mohamed Warsame	F	Puntland
125.	Abdirahman M. Omar	M	Amana Insurance
126.	Sharmarke Abdisalam	M	MoF – Accountant General
127.	Salim Omar Nur	M	MoLFR
128.	Osman Ibrahim Yusuf	M	Izma Production
129.	Mohamed Ali Hashi	M	Community Member
130.	Abdushakur Abdirahman	M	SNU
131.	Abdiwali Said Barre	M	Dairy Farms Puntland
132.	Maymun Abdullahi	F	Women Business
133.	Ali Hassan	M	Aran Agro Farm
134.	Abdulqadir Mohamed Shair	M	PWDs
135.	Anwar Mohamed Ali	M	PWDs
136.	Abdifatah Mohamed Hassan	M	PWDs
137.	Abdirizaq Warsame	M	PWDs
138.	Faduma Sheikh Ali	F	Women Business
139.	Abdirahman Shuayb	M	PWDs

Virtual Participants			
No	Name	Gender	Institution
140.	Abdirizaq Warsame	M	PWDs
141.	Hassan Ahmed Osman	M	Hirshabelle
142.	Ismahan Hassan Mohamed	M	MoLFR
143.	Salma Sheikh Omar	F	MoERA
144.	Aisha Abdi Isak	F	PWDs
145.	Hafsa Haji Abdi	F	PWDs
146.	Ibrahim Mohamed	M	SNU
147.	Bakar Abdi	M	Community Member
148.	Barre Ahmed	M	Sahan Drugs
149.	Dr. Ahmed Salad	M	Sahan Drugs
150.	Abdirizaq Mire Hashi	M	Beder Dairy & Meat
151.	Abdirahman Hassan Yusuf	M	Raas Farm
152.	Nasteho Ahmed	F	iLAB
153.	Guled Abdi Ahmed	M	MoLFR – Galmudug
154.	Malyun Ali Said	F	SIMAD University
155.	Abdikarim Hassan Ibrahim	M	SIMAD University
156.	Roble Ibar Dirie	M	Amal Bank
157.	Dr. Qassim Abdi	M	MoLFR – Federal
158.	Haykal Dahir	M	UNDP
159.	Ibrahim Dahir Osman	M	Shafi Honey
160.	Abdulkadir Dahir	M	Dunya Bile
161.	Ibrahim Dahir Osman	M	Somali National University
162.	Abdirahman B. Dubad	M	SomRep

11.3 Annex III: Terms of Reference for preparation of Sub Project Environmental and Social Impact Assessment

1. Introduction

225. The De-Risking, Inclusion and Value Enhancement of Pastoral Economies Project (DRIVE) is part of the Horn of African Initiative through Investment Project Financing of the World Bank. The proposed project is regional, and will cover Ethiopia, Djibouti, Kenya and Somalia. With the elaboration of the chapter for Somalia, the FGS will undertake environmental and social impact assessment (ESIA) of the project. The FGS will conduct environmental and social assessment of the proposed project to ensure that the project activities are environmentally and socially sound and sustainable. The environmental and social assessment will be proportionate to the risks and impacts of the proposed project. The inputs from the assessment will inform the update of the project design. Also, the inputs of the assessment will be used to identify the appropriate mitigation measures and actions for the effective implementation of the project.

2. Project Background

226. The DRIVE project intends to de-risk the pastoralists in the Horn of Africa including FGS by: (i) protecting them against drought with enhanced financial access and risk transfer; and (ii) linking them better to markets through trade facilitation and the mobilization of private capital in the livestock value chains. The project has devised two vital components in order to achieve this development goal.

227. Component 1 involves De-Risk and Financing. Through the activities under this component, the project supports access to financial service to the pastoralist production group. This will involve two major interventions: first, transfer pastoralists' drought risk to the insurance market and mobilize the capital of private (re)insurance companies (local and international) on the total sum insured; and second, mobilize savings from pastoralists themselves that could be invested in other types of business, thus achieving income diversification and increasing their access to credit.

228. Component 2 concerns Livestock Value Chains and Trade Facilitation. This component intends to connect pastoralists better to markets through undertaking three subprojects. First, by upgrading quality infrastructure, the project would support capacity building and equipment to ensure compliance of livestock and livestock products with export standards. Second, through trade facilitation and trade logistics, the project will strengthen quarantine facilities and their efficient linkages to ports with digitization of export, improve the logistics on the transit of live animals, and improve data infrastructure to better capture livestock trade and prices. Third, by providing seed capital, the project will attract private investment in the livestock value chains.

3. World Bank Environmental and Social Framework (ESF)

229. The World Bank Group Development Strategy sets out the corporate goals of ending extreme poverty and promoting shared prosperity in all its partner countries. Inspired by this vision, the World Bank Group is globally committed to environmental sustainability. Its development strategies recognize that all economies still need to grow but they need to do so in an environmentally-friendly manner, so that income producing opportunities are not pursued in ways that limit or close off opportunities for future generations. Equally, the World Bank's sustainable development strategies recognize, social development and inclusion are critical for all of the World Bank's financing of the development projects. For the Bank, inclusion means empowering all people to participate in, and benefit from, the development projects it finances. Inclusion encompasses measures to promote equality and non-discrimination in the development interventions through the Bank's Investment Project Finance. The World Bank Environmental and Social Framework which become operational since October 2018 converts these aspirations and principles of sustainable development into practical, project-level applications within the context of the Bank's mandate as set out in its Environmental and Social Standards (ESSs). As assessed in the Project Appraisal Document and Environmental and Social Management Framework (ESMF), eight out of those ten ESSs required in the Bank's Investment Project Financing are applicable to the DRIVE project with elaboration of the chapter for Somalia. These ESSs are:

- Assessment and Management of Environmental and Social Risks and Impacts (ESS1);
- Labor and Working Condition (ESS 2);
- Resource Efficiency and Pollution Prevention and Management (ESS 3);
- Community Health and Safety (ESS4);
- Biodiversity Conversation and Sustainable Management of Living Natural resources (ESS 6); and
- Stakeholder Engagement and Information Disclosure (ESS10).
- ESS 9 financial intermediaries

4. Objective and Scope of the Work

230. The ESIA will be conducted in accordance with the World Bank's ESS1 and will consider, in an integrated way, all relevant direct, indirect, and cumulative environmental and social risks and impacts of the per the above listed ESSs relevant for the DRIVE project. To this end, the objectives of the ESIA are:

- To identify, evaluate, and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs relevant in the project.
- To adopt a mitigation hierarchy approach in the project implementation 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, mitigate; 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 assessment, development, and implementation of the project, whenever appropriate.

5. Key Tasks

231. The preparation of the environmental and social impact assessment will include the following:

A. Executive summary

- Concisely discusses significant findings and recommended actions.

B. Legal and institutional framework

- Analyzes the legal and institutional framework for the project, within which the environmental and social assessment is carried out, including the issues set out in ESS1, paragraph 26-46
- Compares the Borrower's existing environmental and social framework and the ESSs and identifies the gaps between them.
- Identifies and assesses the environmental and social requirements of any co-financiers.

C. Project description

- Concisely describes the proposed project and its geographic, environmental, social, and temporal context, including any offsite investments that may be required (e.g., dedicated pipelines, access roads, power supply, water supply, housing, and raw material and product storage facilities), as well as the project's primary suppliers.

- Through consideration of the details of the project, indicates the need for any plan to meet the requirements of ESS1 through 10.
- Includes a map of sufficient detail, showing the project site and the area that may be affected by the project's direct, indirect, and cumulative impacts.

D. Methodology

232. In general, the breadth, depth, and type of analysis undertaken as part of this ESIA will depend on the nature and scale of the environmental and social risks and impacts of the project. This may require the use of different methods and tools in conducting the ESIA. In any case, the methodology should comprise desk review, quantitative survey, stakeholder consultation, and key informant interview.

E. Baseline data

- Sets out in detail the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures. This should include a discussion of the accuracy, reliability, and sources of the data, as well as information about dates surrounding project identification, planning, and implementation.
- Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions.
- Based on current information, assesses the scope of the area to be studied and describes relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the project commences.
- Takes into account current and proposed development activities within the project area but not directly connected to the project.

F. Environmental and social risks and impacts

233. Takes into account all relevant environmental and social risks and impacts of the project. This will include the environmental and social risks and impacts specifically identified in ESSs2–8, and any other environmental and social risks and impacts arising as a consequence of the specific nature and context of the project, including the risks and impacts identified in ESS1, paragraph 28.

G. Mitigation measures

- Identifies mitigation measures and significant residual negative impacts that cannot be mitigated and, to the extent possible, assess the acceptability of those residual negative impacts.
- Identifies differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable.
- Assesses the feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of proposed mitigation measures, and their suitability under local conditions; the institutional, training, and monitoring requirements for the proposed mitigation measures.
- Specifies issues that do not require further attention, providing the basis for this determination.

H. Analysis of alternatives

- Systematically compares feasible alternatives to the proposed project site, technology, design, and operation—including the "without project" situation—in terms of their potential environmental and social impacts;
- Assesses the alternatives' feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local conditions; the institutional, training, and monitoring requirements for the alternative mitigation measures.
- For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible.

I. Design measures

- Sets out the basis for selecting the particular project design proposed and specifies the applicable EHSGs, or if the ESHGs are determined to be inapplicable, justifies recommended emission levels and approaches to pollution prevention and abatement that are consistent with GIIP.

J. Key measures and actions for the Environmental and Social Commitment Plan (ESCP)

- Summarizes key measures and actions and the time frame required for the project to meet the requirements of the ESSs. This will be used in developing the Environmental and Social Commitment Plan (ESCP).

K. Updating related ESRMPs

L. Include updating related safeguards instruments such as ESMPs, SEP.

Appendices

- List of the individuals or organizations that prepared or contributed to the environmental and social assessment.
- References—set out the written materials, both published and unpublished, that have been used.
- Record of meetings, consultations, and surveys with stakeholders, including those with affected people and other interested parties. The record specifies the means of such stakeholder engagement that were used to obtain the views of affected people and other interested parties.
- Tables presenting the relevant data referred to or summarized in the main text.
- List of associated reports or plans.

6. Required Qualifications

234. This assignment requires experience in environmental and social assessment and knowledge of World Bank rules and procedures related to environmental and social aspects. To carry out this assignment, the firm or groups of Consultant needs to meet a minimum of the following requirements:

- Minimum of Master's Degree in development studies, natural resource management, environmental management, sociology or social anthropology or related area combined with at least five years of work experience in areas relevant to the activities of the above-mentioned tasks.
- Familiarity with analytical tools, ability to assess current situation of the local context, good understanding of local development and youth and gender issues.
- Preference will be given to previous and proven experience in preparing Environmental and Social instruments under the new World Bank Environmental and Social Framework (ESF) applied to investment project financing.
- Experience in conducting public consultations and stakeholder participation processes.
- Oral and written fluency in English.

11.4 Annex IV: Grievance/Complaint Resolution/Escalation Form

<table>
<tr><th colspan="2">COMPLAINT/GRIEVANCE REGISTER</th></tr>
<tr><td>Unique Reference No. Pre-Printed</td><td>Date received:</td></tr>
<tr><td colspan="2">Name of Complainant or Representative of group of complainants</td></tr>
<tr><td rowspan="2">Contact Details of complainant or representative of group of complainants (if available),

Anonymous complaints are also allowed.</td><td>Residence:</td></tr>
<tr><td>Telephone:</td></tr>
<tr><td>Location where complaint is received:</td><td>Location the grievance is related to:</td></tr>
<tr><td>State</td><td>State</td></tr>
<tr><td>Region</td><td>Region</td></tr>
<tr><td>District</td><td>District</td></tr>
<tr><td rowspan="2">Grievance is related to (nature of complaint):</td><td></td></tr>
<tr><td>Other</td></tr>
<tr><td colspan="2">Description of Complaint:</td></tr>
<tr><td>Grievance</td><td>Non-grievance (grievances not related to the project)</td></tr>
<tr><td>Name of Complainant:</td><td>Signature/Thumb print of Complainant</td></tr>
<tr><td>Name of witness (If available)</td><td>Signature/Thumb print of witness (If available)</td></tr>
<tr><td>Name of recipient</td><td>Signature of recipient</td></tr>
<tr><td rowspan="3">Mode of receipt</td><td>Phone:</td></tr>
<tr><td>Letter:</td></tr>
<tr><td>Verbal:</td></tr>
</table>

11.5 Annex V: Labour Management Procedures (LMP)

1. Introduction

235. The DRIVE ESMF identified potential risks of the project with adverse impacts on labour and working conditions, community health and safety and the wellbeing (physical, mental and social) of children. The preparation of this LMP is to facilitate planning for the labour requirements of the project and set out a systematic approach to the management of labour issues in the course of implementation. More specifically, the preparation of the LMP helps to: (a) identify the different types of project workers that are likely to be involved in the project; (b) set out the ways of meeting the requirements of ESS2 and national labour laws that apply to the different types of project workers; and (c) mitigate the potential risks and impacts in resulting from the project implementation. Thereby the LMP aims to: promote safety and health at work; promote the fair treatment, non-discrimination and equal opportunity of the project workers; protect project workers, including vulnerable workers such as women, persons with disabilities, and children as appropriate; prevent the use of all forms of forced labor and child labor; and provide project workers with accessible means to raise workplace concerns.

2. Overview of labour use in the project

236. The DRIVE ESMF the chapter foresees very substantial labour requirements for the project activities both under De-Risk and Financing and Livestock Value Chains and Trade Facilitation components. This will create wide-ranging employment opportunities that may result in labour influx along the project implementation corridors. Given this circumstance, the project workers can be engaged in many different ways. Hence, in the sub-sections to follow, the DRIVE LMP identifies the different types of workers that may be engaged in the project and describes them together with the way in which ESS2 requirements apply to each type of project worker.

2.1 Direct workers

- A direct worker is a worker with whom the Borrower has a directly contracted employment relationship and specific control over the work, working conditions, and treatment of the project worker. The worker is employed or engaged by the Borrower, paid directly by the Borrower, and subject to the Borrower's day-to-day instruction and control. Examples of direct workers may include persons employed or engaged (e.g., PIU staff) by the Ministry of Finance to carry out the implementation, supervision and monitoring of the DRIVE project. In such a case, the DRIVE LMP applies the requirements of ESS2 paragraphs 9 to 30.
- Where government civil servants are working in connection with the project, whether full time or part time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project the requirements of ESS2 will not apply to such government civil servants, except for the provisions of ESS2 paragraphs 17 to 19 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational Health and Safety).
- ESS2 does not seek to interfere in the relationship between the government and its civil service employees, who are normally employed under specific terms and conditions that may reflect mandatory legal requirements. While government civil servants may work on the project, for example, in the project implementation unit or project management office, their status as government civil servants is not affected.
- In the case of an effective legal transfer of employment to, or engagement of a government civil servant in the project or of a government civil servant who takes a formal unpaid leave of absence to work on the project, ESS2 applies. In these cases, for the purposes of the project, workers are no longer subject to the legal requirements relating to civil servants, and are instead employed directly by the project and subject to the provisions of ESS2 relating to direct workers referred to as in the first point.

- There may be situations in which government civil servants have no employment relationship with the project and, therefore, cannot be considered project workers. Nevertheless, they may be involved in project activities in their governmental capacity, for example, providing OHS training. The requirements of ESS2 does not apply to such persons.

2.2 Contracted workers

- *A contracted worker is* a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third party exercises control over the work, working conditions, and treatment of the project worker.
- *'Core functions'* of the project constitute those production and/or service processes essential for a specific project activity without which the project cannot continue (e.g., livestock insurance provision and transportation logistics). Hence, *third parties* include entities such insurance service and transportation logistics providers. The implementation of DRIVE anticipates a range of third parties' involvement in meeting the labour needs for the project.
- In such circumstances, the DRIVE LMP applies the requirements under ESS2 paragraphs 9 to 33 as specified in Section E.

2.3 Primary supply workers

237. A *primary supply worker* is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. The implementation of the DRIVE expects there is a requirement that the goods or materials be provided directly to the project for its core functions on an ongoing basis. This means that second, third and further levels of the supply chain may exist in the labour requirement for the project. In this case, the DRIVE LMP applies the requirements of ESS2 paragraphs 39 to 42 of ESS2 as specified in Section G.

2.4 Community workers

238. The implementation of the DRIVE project may include the use of community workers in a number of different circumstances. This may include the use of community workers by private companies under component 2. Instead, the DRIVE LMP applies only those requirements of ESS2 paragraphs 34 to 38 as specified in Section F.

3. Assessment of key potential labour risks

- ***Gaps in national labour laws and regulations:*** The review of the existing national labour laws showed gaps in providing the labour management procedures specifically apply to the employment opportunities created by the DRIVE project and the different categories of project workers (direct workers, contracted workers, primary supply workers and community workers). This may seriously jeopardize the working conditions and management of project worker relationships as set out in ESS2.
- ***Occupational* Health and Safety:** Agriculture has one of the worst fatal accident and occupational health records of any major employment sector. Occupational health and safety hazards related to the daily operations of the mammalian livestock sector include: Exposure to physical hazards, Exposure to chemical hazards, Exposure to biological agents and Confined spaces.
- **Community Health and Safety (CHS) risks and impacts** (CHS) risks and impact due to project activities, equipment, and infrastructure can be anticipated from different perspectives: (a) risks of communicable diseases from project workers to local communities; (b) community health risks from exposure to environmental pollution (e.g. the potential for community exposure to waterborne diseases, hazardous materials and wastes); (c) Increased traffic and road safety risks due to facilitation of transportation logistics by the project; and (d) health risks from project activities may differ within

communities, depending on various factors that can contribute to vulnerability, including age, gender, status, physical or mental illness or disability, poverty or economic disadvantage, or dependence on unique natural resources,

- **Increase *incidence of GBV/SEA*:** Women and girls of the project-affected communities may experience increasing incidence of SEA. It is likely that the DRIVE project will introduce benefits or services to the project-affected communities, either momentarily or indefinitely. In such case, project workers may broker access to the benefits or services that are financed through the project. This creates a power differential between the project worker who uses access to the benefits or services to extract gain or favor from those who seek them.
- **Spread of Infectious Disease – COVID-19:** Possible spread of infectious diseases as a result of failure to adhere to COVID-19 prevention measures. Possible infection route includes: contact with infected mask; weak compliance with the precaution measures for infection prevention and control on COVID-19 including hand washing hygiene, respiratory / cough antiquates among others.
- **Poor Stakeholder Engagement:** The level of participation of all relevant stakeholders during project planning and designing depends on the level and quality of engagement employed.
- **Sexual Abuse, Exploitation, and Harassment**: Several concerns on the potential for Gender-Based Violence (GBV), increased risk of sexual abuse of vulnerable women workers, increased risk of sexual exploitation and violence of persons in the various locations where livestock will be transported that would perpetuate social abuse. Other abuses may be experienced by community members who may be subject to livestock surveillance and follow-up, as well as chemical spray workers by co-workers, trainers, and supervisors.
- **Child Labor**: The risk of child labor would emerge through the contracted labor such as conditional grant activities as many of the individuals in the target local communities may decide to release their children to maximize these conditional grant gains.
- **Labor Disputes over Terms and Conditions of Employment**. The likely causes for labor disputes are demand for limited employment opportunities; differential labor wages/rates and delays of payment; discrimination under conditional grant activities, disagreement over working conditions; and health and safety concerns in the work environment. Further, there is a risk that employers may retaliate against workers for demanding legitimate suitable working conditions or raising concerns regarding unsafe and/or unhealthy work conditions or any grievances that may lead to labor unrest and work stoppage.
- **Discrimination and Exclusion of Vulnerable Groups.** If unmitigated, vulnerable groups of people as well as communities may be subject to increased risk of exclusion from employment opportunities under the DRIVE project. Such vulnerable and marginalized groups include expectant women, female-headed households, single parents, the sick and elderly, persons with disabilities (PWDs), and the nutritionally challenged. Sexual harassment and other forms of abusive behavior by workers or managers will also have the potential to compromise the safety and wellbeing of the vulnerable groups of workers and the local communities while adversely affecting project performance.
- ***Child labour:*** The availability of large number of off-school children coupled with the income problem of the pastoral households in the project areas may cause risks of children labour. Given this pushing factor, irresponsible private investors may seek to make the advantage of hiring cheap child labour.

- ***Minimum age:*** A child over the minimum age and under the age of 18 may be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

4. Overview of labour legislation: Terms and conditions

239. The Provisional Constitution of the Federal Republic of Somalia (adopted in August 2012) provides the legislative framework for labor issues. The Labor Code[21] of Somalia (Law Number 65, adopted in 1972) is the specific labor law governing all aspects of labor and working conditions, which covers the contract of employment, terms and condition, remuneration, occupational health and safety, trade unions and labor authorities. The provisions of the Labour Code apply to all employers and employees in all project areas. The Labour Code is applicable to all types of workforce of the project. The Labour Code is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation (see Section III on the institutional framework). The public service or public institutions are in additional governed by the Civil Service Law (Law Number 11).

240. Below is the list of relevant provisions of the Labour Code with regard to terms and conditions of work.

1) Content of individual contract of employment (Article 46 of the Labor Code)
   - Subject to the provision of this Code or regulations made hereunder, a written individual contract of employment shall specify the following: (a) name and father's name of workers; (b) address, occupation, age and sex of workers; (c) employer's name and address; (d) nature and duration of contract; (e) hours and place of work; (f) remuneration payable to the worker; and (g) procedures for suspension or termination of contract.
   - The Law for the Somali Civil Servants No.11, Article 86: Work Contract
   - Any person to be employed for Government service shall enter an agreement of contract with the institution that takes the person which its period shall be based on the institution's need but can however be renewed.
2) Notice for termination of contract (Article 50 of the Labor Code)
   - Either of the contracting parties may terminate a contract of employment by giving written notice as under:
     (a) Not less than ten days in the case of manual workers;
     (b) Not less than 30 days in the case of non-manual workers:
     Provided that no notice need be given in case the duration of contract does not exceed one month.

The Law for the Somali Civil Servants No.11. Article 22: Termination of Person under Service Trial
   - The head of the Department together with the labor commission can terminate from work a new employee within the period of his/her service trial if firmly proved that hi/her work performance in the effective and shall have no right.
3) Minimum wages (Article 72 of the Labor Code).
   - Taking into consideration the economic and social conditions of the country (and in consistence with the provisions of article 71), the minimum wages for any category of workers may be determined by decree of the President of the Republic, on the proposal of the Minister, having heard the Central Labour Commission, and with the approval of the Council of Secretaries.
   - The Law for Somali Civil Servants No.11. Article 85: Arrangements of Government Workers Basic Salaries. The basic salaries for the Civil servants of the Government shall be arranged, determined

[21] The Labor Code is in the review process with support from ILO. The revised draft Labor Code was agreed and adopted in February 2019 by representatives from various ministries of the Federal Government of Somalia, all Federal Member States, employers, workers, and academia. The Federal Ministry of Labour could not predict the likely timeframe for the Parliamentary approval, and advised that the existing Labour Code (1972) shall continue to be applicable until revised code becomes the law. Consultation with both State's Labour Ministries also have confirmed that they follow the national Labour Code in administration of labor matters in their States.

and set up by special Committee composed of members from the ministry of labor and Development of workers, the central Bank and the National Civil Servant commission of the Government.

4) Hours of work (Article 85, 86 of the Labor Code).
- The normal hours of work of a worker shall not exceed eight a day or 48 a week.
- Hours worked in excess of the normal hours of work shall not exceed 12 a week and shall entitle a worker to a proportionate increase in remuneration, which shall in no case be less than 25 per cent of the normal remuneration.

5) Weekly rest (Article 96 of the Labor Code)
- Every worker shall be entitled to one day's rest each week, which should normally fall on Friday. It shall consist of at least 24 consecutive hours each week.
- Workers shall also be entitled to a rest day on public holidays recognized as such by the State.

6) Annual leave (Article 97 of the Labor Code)
- Workers shall be entitled to 15 days' leave with pay for every year of continuous service.
- An entitlement to leave with pay shall normally be acquired after a full year of continuous service.

7) Fringe benefits (Article 73 of the Labor Code)
- Any employer shall provide (a) accommodation when a worker is required to be away from his normal residence; (b) free food to workers, or subsistence allowance in place thereof; (c) free transport to and from the place of work, when a worker is required to work in a town or locality away from his normal residence.

8) Deductions from remuneration (Article 82 of the Labor Code)
- No deductions other than those prescribed by the Code or regulations made hereunder or any other law or collective labor agreement shall be made from a worker's remuneration, except for repayment of advances received from the employer and evidenced in writing.

9) Death benefit (Article 53 of the Labor Code)
- In case of death of a worker during his contract of employment, the employer shall pay to his heirs an amount not less than 15 days' remuneration as death benefit for funeral services.

10) Expecting and nursing mothers (Article 91 of the Labor Code)
- A woman worker shall be entitled, on presentation of a medical certificate indicating the expected date of her confinement, to 14 weeks' maternity leave with half pay, of which at least six weeks shall be taken after her confinement, provided that she has been employed by the employer for at least six months without any interruption on her part except for properly certified illness.

11) Nursing breaks (Article 92 of the Labor Code)
- A woman worker who is nursing her own child shall be entitled, for a maximum of a year after the date of birth of the child, to two daily breaks of one hour each. The breaks shall be counted as working hours and remunerated accordingly.

5. The World Bank Environmental and Social Standards: ESS2

241. The World Bank's stipulations related to labor are outlined in ESS2. This helps the Borrowers in promoting 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. Key objectives of the ESS2 are to:

- Promote safety and health at work;
- Promote the fair treatment, nondiscrimination and equal opportunity of project workers;

- 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;
- Prevent the use of all forms of forced labor and child labor;
- Support the principles of freedom of association and collective bargaining of project workers; in a manner consistent with national law; and
- Provide project workers with accessible means to raise workplace concerns.
-

242. ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers. Where government civil servants are working in connection with the project, whether full-time or part time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to government civil servants except for the provisions of paragraphs 17 to 20 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational Health and Safety).

243. Working conditions and management of worker relationships. The Borrower will develop and implement written labor management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS. The procedures will address the way in which this ESS will apply to different categories of project workers including direct workers, and the way in which the Borrower will require third parties to manage their workers.

244. Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits, as well as those arising from the requirements of this ESS. This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.

245. For more details on the WB Environmental and Social Standards, please follow the below links: www.worldbank.org/en/projects-operations/environmental-and-socialramework/brief/environmentaland-social-standards and http://projects-beta.vsemirnyjbank.org/ru/projects-operations/environmental-andsocialframework/brief/environmental-and-social-standards.

6. Key Gaps between National Legislation and World Bank ESS2

Table 11-1 below gives the summary of World Bank Requirements and Key Gaps with FGS/Somaliland Legal Requirements:

Table 11-1: Gaps in Somalia Labour Law as compared to WB ESS2 requirements for DRIVE project

ESS & Topic	Major WB requirements	Key requirements/gaps in FGS/Somaliland legal framework	Principles to be followed by the Project
A. Working conditions and management of labor relations	➢ Written labor management procedures ➢ Terms and conditions of employment ➢ Nondiscrimination and equal opportunity ➢ Worker's organizations ➢ Elaborate Labor Management Plans including Contractor's ESMP warranted	➢ Written employment contract required, including procedures and employment conditions ➢ No provision for Labor Management Plans.	LMP developed for the project. Terms and conditions in the LMP are consistent with national law.
B. Grievance mechanism	➢ RM should be in place for direct and contracted workers	➢ No project specific GRM is warranted. ➢ However, it is allowed to apply to: a) conciliation commission; b) Labor Inspection under the Ministry of Employment and Labor Relations; and c) court.	Prepare GRM for workers (Direct workers) as per this LMP. Contractors will develop C-LMP including provision to establish and maintain GRM for their employees.
C. Occupational Health and Safety	➢ Detailed Procedure required for every project. ➢ Requirements to protect workers, train workers, document incidents, emergency preparation, addressing issues; and ➢ Monitor OSH performance	➢ No detailed procedure specific to every project. ➢ Requirements to protect workers, train workers, document incidents, emergency preparation.	Prepare site specific OHS Plan for the project, Prepare Training Plan for workers, document incidents, and emergency preparation for the site
D. Category of workers	Specifies these following categories of workers: direct workers; contracted workers; community workers; and primary supply workers.	No reference to Community and Primary Supply Workers	No community workers will be involved in the Project. Screening and monitoring measures will be introduced for primary suppliers as per this LMP.
E. Minimum age of workers	Persons 14-18 are prohibited from work considered hazardous, that will interfere with their education or be harmful to their health or development	Employment permissible for 12 plus age, but for nonhazardous work, with limited hours, and guardian permission.	ESS2 will be followed. No direct and contracted workers under 18 will be recruited.

ESS & Topic	Major WB requirements	Key requirements/gaps in FGS/Somaliland legal framework	Principles to be followed by the Project
	(physical, mental, spiritual, moral, or social).		
F. Protecting the work force	Child labor prohibition Forced labor prohibition	Child labor prohibited No forced labor is allowed.	LMP has been prepared with clear guidance on no use of child and forced labor

Note that the LMP is a living document that will be updated during implementation. The MoF will ensure that the above-mentioned gap will be covered by the project contractors. Each Contractor and the implementing entity will have to follow this LMP and introduce their own Grievance Redress Mechanism.

7. Responsible staff

246. Different parties are expected to involve in the implementation of the DRIVE project including: (a) project implementing organizations; (b) third parties (livestock insurance service providers, private investors in livestock production and product processing, quality infrastructure upgrading contractor, transport logistic providers; and (c) primary suppliers providing goods and materials to the project. All these entities will be responsible for the implementation of the DRIVE LMP depending on the category of project workers over which they exercise control for the work and working conditions. But, the project implementing organization (MoF) has double responsibilities for the reason stated next.

247. For direct workers and community workers: the responsibility of implementing the LMP exclusively rests on the implementing organization the MoF and its line offices.

248. For contracted workers: the respective third parties will be responsible to strictly apply the requirements of labour and working conditions as set out for contracted workers in the DRIVE LMP.

249. For primary supply workers: the respective primary supply organization will be responsible to strictly apply the requirements of labour and working conditions as set out for primary supply workers in the DRIVE LMP.

250. Double responsibility of the MoF: Besides implementing the LMP concerning direct workers and community workers, the MoF and its line offices will be responsible for the implementation of the LMP relating to contracted workers and primary supplier workers. This will happen in two ways. First, the MoF and its line office are in charge of ensuring that the third parties and primary suppliers develop the means of labour management for their respective category of workers as required in the labour and working conditions specified in this DRIVE LMP. Second, the project implementing organization will establish procedures for managing and monitoring the performance of third parties and primary suppliers in relation to the requirements of DRIVE LMP.

8. Policies and procedures

251. This section outlines the main policies and procedures to be followed during the implementation of the DRIVE project and will be updated and amended as needed, after contracts have been awarded.

8.1 Project's environmental and social management

252. In an effort to mitigate the environmental and social impact relating to the DRIVE project, it is the intention that mitigation measures will be put in place by incorporating standardized clauses in the tender documentation and contract documents with the third parties and primary suppliers involving in the DRIVE project. So that the involving entities will be aware of the environmental and social obligations under the project before undertaking the activities for which they are assigned for.

253. Most environmental and social impacts of subprojects resulting from activities directly under the control of third parties and primary suppliers will be mitigated directly by the same entities. As a consequence, ensuring that contractors effectively mitigate project activities related impacts is the core of the DRIVE project's approach.

254. As mandatory part of the contractual requirement, all third parties and primary suppliers need to ensure all documentation related to environmental and social management, including the LMP, is available for inspection at any time by the MoF or its appointed agents. The contractual arrangements with each project worker must be clearly defined in accordance with Somalia Labour Law. A full set of contractual requirements related to environmental and social risk and impact management will be provided in the Projects' Environmental and Social Impact Assessment. All environmental and social requirements will be included in the bidding documents and contracts in addition to any additional clauses, which are contained, in the project's environmental and social instruments.

255. Under no circumstances will MoF, third parties, primary suppliers or their contractors or sub-contractors involving in the DRIVE project engage in forced labor including bonded labor (working against an impossible debt), excessive limitations of freedom of movement, excessive notice periods, retaining the worker's identity or other government-issued documents or personal belonging, imposition of recruitment or employment fees payable at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work in a non-voluntary basis.

8.2 Project's Occupational Health and Safety (OHS)

256. The DRIVE project OHS measures will comply to: (a) the national occupation health and safety proclamations and regulations highlighted in Section five of this LMP; (b) the WB Environmental, Health and Safety (EHS) Guidelines; and (c) as appropriate, the industry-specific EHSGs and other Good International Industry Practice (GIIP).

257. The implementation of the DRIVE project will be based on the OHS first principle. It avoids or eliminates sources of hazards to project workers' health and safety rather than simply addressing the hazard through protective measures such as personal protective equipment. However, when it is not feasible to avoid or eliminate the hazard, appropriate protective measures are included in the project's OHS measures, such as controlling the hazard at its source through the use of protective solutions, and providing adequate personal protective equipment at no cost to the project worker. There is no potential for construction or any kind of civil works. However, the occupational hazards associated with the Technical Assistance include office related ergonomics as well at accidents during travelling from one site to another site.

258. The project should provide adequate first aid facilities and relevant training. Protective measures would include hazard labelling in languages understandable to the project workers, and training and equipment to prevent occupational exposure to hazardous materials.

259. The way in which the OHS provisions apply in the DRIVE depends on the type of project activities; the nature and severity of the hazards, risks, and impacts; and the types of workers involved. Accordingly, appropriate OHS measures are incorporated into the design and implementation of the project to prevent and protect workers from occupational injuries, illness, or impacts associated with exposure to hazards encountered in the workplace or while working.

260. The OHS measures applying to the DRIVE project will be set out in the legal agreement between: (a) WB and MoF on behalf of the FGS; and (b) MoF and primary supplier involving in the project. Accordingly, the parties will:

- Complying with legislation and other applicable requirements which relate to the company's occupational health and safety hazards.
- Enabling active participation in OHS risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards.
- Communicating this policy statement to all persons working in the project with emphasis on individual OHS responsibilities.
- Availing this policy statement to all interested parties at all MoF facilities and sites.

261. Project workers at all levels have the authority to stop any activity they consider to be a danger to themselves or other workers, the public or the environment. The project is committed to non-retaliation to stop-work actions by project workers.

262. The ESS will develop sub-policies, guidelines, procedures, instructions and training and awareness materials to support this policy.

8.3 Project's management of gender-based violence

263. Third parties, primary suppliers or their constructors or sub-contractors will need to maintain labor relations with local communities through a code of conduct (CoC). The CoC commits all persons engaged by these entities to acceptable standards of behaviour. The CoC must include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The CoC should be written in plain language and signed by each worker to indicate that they have:

- received a copy of the CoC as part of their contract;
- had the CoC explained to them as part of induction process;
- acknowledged that adherence to this CoC is a mandatory condition of employment;
- understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities;

264. A copy of the CoC shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in English and the language of the project-affected communities.

265. Likewise, all project involving employers (MoF, third parties, primary suppliers or their constructors or sub-contractors) must address the risk of gender-based violence through:

- Mandatory training and awareness raising for the workforce about refraining from unacceptable conduct toward local community members, specifically women. Training may be repeated;
- Informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted;
- Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence;
- Developing a system to capture gender-based violence, sexual exploitation and workplace sexual harassment related complaints/issues.
-

266. This process will be under the portfolio of the Social Standards Officer who shall identify and engage the relevant stakeholders on GBV issues.

9. Child labour and minimum age

267. A child under the age of 18 will not be employed or engaged in connection with any DRIVE project activity. Below is a list of indicative age verification means that could be used in Somalia context where official ID system is broadly unavailable:

- Check the birthday on official documents such as birth certificate or other credible records, where available;
- Obtain written confirmation from a medical practitioner, parents or guardian; or
- Inquire with a local community leader, community action group or with other credible community sources.

268. The Provisional Constitution of the Federal Government of Somalia and Somalia Labor Code prohibit child labor and forced labor specifies the minimum age means "a young worker who has attained the age of 12-15 but is below the age of 18 years." Given this minimum age, a young worker may be employed or engaged in connection with the project only under the following specific conditions: (a) the work does not fall within ESS2 paragraph 19; (b) an appropriate risk assessment is conducted prior to the work commencing; and (c) the Borrower conducts regular monitoring of health, working conditions, hours of work, and the other requirements of the ESS2.

269. A young worker will not be employed or engaged in connection with the project in a manner that is likely to be hazardous, interfere with the child's education, or be harmful to the child's health or physical, mental, spiritual, moral, or social development.

10. Terms and conditions

270. Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation, and benefits, as well as those arising from the requirements of ESS2. This information and documentation will be provided at the beginning of the working relationship, and when any material changes, to the terms or conditions of employment occur.

271. Documentation should be appropriate and relevant to the length and nature of the employment or engagement, accessible to inform the project workers concerned, and provided in a language understood by the workers.

272. Project workers will be paid on a regular basis as required by national law and labor management procedures. Deductions from payment of wages will only be made as allowed by national law or the labor management procedures, and project workers will be informed of the conditions under which such deductions will be made. Project workers will be provided with adequate periods of rest per week, annual holiday and sick, maternity and family leave, as required by national law and labor management procedures. Documents and contracts include information on the following, as appropriate:

- The name and legal domicile of the employer;
- The worker's name;
- The worker's job title;
- The date employment began;
- Where the employment is not permanent, the anticipated duration of the contract;
- The place of work, or where the work is mobile, the main location;
- Housing and accommodation provisions and payment required, if any;
- Provisions regarding food and payment required, if any;
- Hours of work, rest breaks, leave entitlements, and other related matters;
- Rules relating to overtime and overtime compensation;
- The levels and rules relating to the calculation of salary, wages, and other benefits, including any rules related to timing of payment and deductions;
- The pension and other welfare arrangements applicable to the worker;
- The length of notice that the worker can expect to give and receive on termination of employment;
- The disciplinary procedures that are applicable to the worker, including details of representation available to the worker and any appeals mechanism;
- Details of grievance procedures, including the person to whom grievances should be addressed; and
- Any collective bargaining arrangements that apply to the worker.

273. Project workers will receive written notice of termination of employment and details of severance payments in a timely manner. All wages that have been earned, social security benefits, pension contributions, and any other entitlements will be paid on or before termination of the working relationship, either directly to the project workers or where appropriate, for the benefit of the project workers. Where payments are made for the benefit of project workers, project workers will be provided with evidence of such payments.

Non-discrimination and equal opportunity:

274. Decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.

275.

276. Discrimination in employment as it relates to project workers is any distinction, exclusion, or preference with respect to recruitment, hiring, termination of employment, working conditions, or terms of employment made on the basis of personal characteristics unrelated to inherent work requirements, which nullify or impair equality of opportunity or treatment in employment. Inherent work requirements refer to genuine occupational qualifications that are necessary to perform the work.

277. Equal opportunity is the principle of basing all employment decisions, such as hiring and promotion, on the ability of a person to perform the work, without regard to personal characteristics that are unrelated to the inherent work requirements.

278. However, special measures of protection and assistance to remedy discrimination or selection for a particular job based on the inherent requirements of the job or the objectives of the project will not be deemed as discrimination, provided they are consistent with national law.

Persons with disability:

279. Measures that address working conditions, accessibility of the built environment, and communication of information for project workers with disabilities include, for example, the provision of wheelchair ramps or elevators, or alternative formats of communication, such as large print, Braille, accessible digital formats, or audio tape.

280. Further specific project measures are will be included depending on the nature of disability and the need of the worker in consideration.

Workers' organization:

281. In accordance with the Somalia Labor Code of 1972, the DRIVE LMP recognizes project workers' freedom of association and/or collective bargaining. Project workers under all categories identified in this LMP have the rights to form and to join workers' organizations of their choosing, project workers are not discouraged from, or discriminated or retaliated against, for forming or joining (or attempting to form or join) such organizations.

282. For the purpose of the DRIVE LMP, a workers' organization is any organization of workers for the purpose of furthering and defending their interests, in particular with regard to working conditions and terms of employment. They are formed and organized by workers, and should operate without outside control or interference. Workers' organizations should be representative of the workforce and operate pursuant to the principles of fair and reasonable representation of workers and their interests in the context of the project.

283. Collective bargaining consists of discussions and negotiations among employers, employers' organizations, and workers' organizations for the purpose of determining working conditions and terms of employment by joint agreement. It also includes instructions on the implementation and administration of any agreements that may result from collective bargaining and the resolution of issues and grievances that arise in the employment relationship with respect to workers represented by the workers' organization. Collective bargaining can take place in different ways, depending on the categories of project workers.

11. Grievance Redress Mechanism (GRM)

284. DRIVE requires that a grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers.

285. The provision of the DRIVE LMP is that workplace concerns are usually different from issues raised by project-affected parties and other stakeholders, and therefore call for a separate mechanism to address them. The design of a workplace grievance mechanism includes elements of a grievance mechanism as identified in ESS10 and the accompanying guidance, but will also include features specifically designed to address the DRIVE project workplace concerns.

286. The DRIVE seeks an effective and appropriate grievance mechanism operates with independence and objectivity, informs workers of the steps being taken to address their concerns, and allows for feedback about the response, within the time frames specified in the grievance mechanism procedure, and an appeals process to which unsatisfied grievances may be referred. To the extent possible, the project grievance mechanism uses or supplements existing workplace grievance mechanisms. The grievance mechanism will be accessible to all direct and contracted workers, taking into account their different characteristics, for example, female workers, migrant workers, or workers with disabilities. Where appropriate, consideration can be given to allowing concerns to be raised anonymously and/or to a person other than an immediate supervisor.

287. The DRIVE project grievance mechanism will be proportionate to the nature and scale and the potential risks and impacts of the project. It will be designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand.

288. The DRIVE project grievance mechanism may utilize existing grievance mechanisms, providing that they are properly designed and implemented, address concerns promptly, and are readily accessible to such project workers. Existing grievance mechanisms may be supplemented as needed with project-specific arrangements.

289. The DRIVE grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

11.6 Annex VI: GBV/SEA/SH Risk Assessment and GBV Prevention and Response Action Plan

1. Conceptual Clarification in GBV Risk Assessment

290. The term GBV is most commonly used to underscore systemic inequality between males and females—which exists in every society in the world—and acts as a unifying and foundational term for most forms of violence perpetrated against women and girls (VAWG). GBV considerations in the DRIVE project need clarify on important concepts without which identifying and planning for GBV mitigation measures are difficult to make. The following are the central terms in understanding the GBV/SEA/SH risks assessment and action plan.

1.1 GBV an Umbrella Term

291. GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed gender differences. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV disproportionately affects women and girls across their lifespan and takes many forms, including sexual, physical, and psychological abuse. It occurs at home, on the streets, in schools, workplaces, farm fields, and refugee camps; during times of peace as well as in conflicts and crises[22]. SEA and SH are manifestations of GBV.

1.2 Sexual Exploitation and Abuse

292. UN defines *sexual exploitation* as any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Whereas, *sexual abuse is the* actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions[23].

1.3 Sexual Harassment

293. The World Bank defines sexual harassment as any unwelcome verbal advances, requests for sexual favours, inappropriate sexual comments and objectification, or unwanted verbal or physical conduct of a sexual nature. Unwelcome invitations or requests for dates—particularly when employees feel that their employment depends on either complying with requests or tolerating the behavior—and creating a hostile office environment, such as displaying sexually explicit or suggestive posters, websites, videos, or screen savers—also are forms of sexual harassment. There could also be a quid pro quo aspect to the behavior, in which employees or persons in a position of power request sexual favors in exchange for professional opportunities.[24]

294. SEA occurs against a beneficiary or member of the community. SH occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff training can include specific instructions on the procedures to report each. SEA and workplace SH are the types of GBV

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[22] World Bank's Good Practice Notes: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works (2020).

[23] UN Glossary on Sexual Exploitation and Abuse 2017, p. 5-6.

[24] World Bank, "Violence Against Women Resource Guide," http://www.vawgresourceguide.org/terminolgy.

most likely to occur in or be exacerbated by the DRIVE project. Thus, the risk identification and mitigation of these forms of GBV are the primary focus of this document.

Table 1: Operationalizing SEA/SH Definitions in the Context of IFP

Official Definition	*Bank Operationalization*	*Example*
Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.	In Bank-financed operations/projects, sexual exploitation occurs when access to or benefit from Bank-financed goods, works, non-consulting services or consulting services is used to extract sexual gain	• A community member is promised employment on the World Bank-financed project site in exchange for sex. • A project worker connecting water lines to homes requests a sexual favor for access to water connection. • A project worker denies a woman passage through the worksite unless she performs a sexual favor.
Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.	In Bank-financed operations/projects, sexual abuse occurs when a project worker (contractor staff, subcontractor staff, supervising engineer) uses force or unequal power *vis-a-vis* a community member or colleague to perpetrate or threaten to perpetrate an unwanted sexual act	• A project worker stays in the cafeteria after dinner and sexually assaults a kitchen staff member • A project worker touches an administrative staff member's breasts and says there is more to come. • A supervisor for a subcontractor asks his female colleague to join him for a business dinner with the main contractor. After dinner he asks her to entertain "the boss" in his room as an appreciation for the contract and her work.
Sexual Harassment: Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.	In Bank-financed operations/projects, sexual harassment occurs within the context of the company of a subcontractor or contractor and relates to employees of the company experiencing unwelcome sexual advances or requests for sexual favors or acts of a sexual nature that are offensive and humiliating among the same company's employees.	• A project worker sends sexually explicit text messages to a coworker • A project worker leaves an offensive picture that is sexually explicit on a co-worker's desk. • A project worker asks all female employees to greet him with a kiss on the cheek every day before work.

Source: World Bank's Good Practice Notes: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works (2020).

1.4 SEA/SH and Consent

295. Consent is a key consideration in GBV particularly with regards to SEA/SH. GBV arises when consent is not voluntarily and freely given. Consent must be informed, based on a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force or threats). There are instances where consent might not be possible due to cognitive impairments and/or physical, sensory, or developmental disabilities. There is no consent when agreement is obtained through:

- The use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation;
- The use of a threat to withhold a project benefit to which the person is already entitled; or
- A promise made to the person to provide a benefit from the project.

1.5 Potential Perpetrators of SEA/SH

296. For the purposes of the DRIVE GBV risk assessment, potential perpetrators of SEA/SH can be any personnel associated with the project and may include consultants and project staff or undertaking technical assistance activities or studies, or the security guards hired to protect a project site.

297. It is not sufficient to focus only on non-local workers that will be employed through the project as potential perpetrators. In activities to raise awareness of GBV and service provision, violence that occurs at the hands of a variety of perpetrators should be addressed.

2. Assessing Risks and Capacity to Respond to SEA/SH in DRIVE Project

298. The preparation of the DRIVE project's GBV Risk Assessment and Action Plan is consistent with the requirement of the World Bank in accordance with its Good Practice Notes: Environmental and Social Framework for IPF Operations in Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing (2017).

2.1 Technical considerations in risk assessment

299. The types of tools to assess GBV risks and what measures should be taken to address the work place GBV risks in the DRIVE project depend on the following technical conditions.

Requirement

300. It states that all World Bank-financed IPF projects involving infrastructure should assess the risks that they may have related to SEA/SH and identify and implement prevention and mitigation measures to address those risks. There are two considerations in this regard:

- *Project-related SEA/SH Risk Assessment:* assessment of the risk of exacerbation/introduction of SEA or SH at the community level; and

- *Capacity Assessment:* assessment of the local capacity to prevent and respond to GBV, including SEA/SH, and the availability of safe and ethical service provision for survivors.

301. As per the requirement, assessing the project-related risk of exacerbating SEA/SH involves two essential issues. First, the country and/or regional context in which the project takes place, and second, the potential risks that the project may bring. These SEA/SH risks need to be assessed throughout the project's life by monitoring the situation, assessing the effectiveness of risk mitigation measures, and adapting them accordingly. When continuous monitoring efforts detect changes to the identified SEA/SH risks and/or actual incidences of SEA/SH, projects will need to adapt the SEA/SH risk level and mitigation strategy.

The SEA/SH risk assessment tool

302. As required in the World Bank's GPN, the assessment of GBV risk has to be undertaken by both the client and the World Bank Task Team. For the Task Team, the assessment of risk should be done through the World Bank's SEA/SH Risk Assessment Tool. This SEA/SH Risk Assessment Tool helps Task Teams understand the issues and risks of SEA/SH in the project areas. It takes into consideration both project-specific details, such as labor influx levels, as well as the country context where the project takes place—such as situations of conflict. The questions are meant only as a starting point and are not intended to be exhaustive. As multiple forms of GBV have the same risk factors and drivers, the tool can be used to understand the overall context and how the project may interact with this context in relation to multiple forms of GBV, not just SEA/SH. The SEA/SH Risk Assessment Tool is designed to be applied at the outset of a new project.

Client-led SEA/SH Risk Assessment

303. For the client, the assessment of SEA/SH risks of a project is normally undertaken as part of project preparation, particularly during community consultations. Stakeholder engagement should be sought to identify existing and potential local SEA/SH risks and stakeholders should be consulted on potential interventions and risk mitigation measures. Consultations with women leaders and those working with adolescent girls and boys and other at-risk groups should be prioritized to enable understanding of SEA/SH risks and trends in the community.

Areas of impacts in GBV risk assessment

304. When considering GBV risk assessment, there are different *"areas of impact"* that influence both the nature of the risk and the appropriate prevention and mitigation measures that the DRIVE project can implement:

- *The project site* is the location where the project's activities are being undertaken. This includes both the actual locations where the project activities are conducted, and also the associated areas such as the locations of workers' camps, quarries, etc.

- The area of impact beyond the project site includes *communities adjoining the project.* This extends beyond the specific location where civil works are being carried out. These communities are at risk of SEA/SH, particularly when workers are highly mobile.

- There are also *regional and national* areas of impact that will not be affected by the specific interventions of the DRIVE project but may benefit through institutional strengthening and other efforts to address SEA/SH risks. An assessment at the regional and/or national level can give clients and Task Teams an understanding of those experiencing GBV in the region or country, as well as the type and scale of violence, and its acceptability in the communities in DRIVE project areas. For example, the less equality between men and women and the more violence against women and girls, the more likely it is that the project will inadvertently reinforce these situations if it does not proactively acknowledge and seek to mitigate this risk.

2.2 Identifying DRIVE project-related GBV risks

305. DRIVE project-related GBV risks factors identifying risks reveal that there is no single driver of GBV including SEA/SH. Studies on Somalia in general and project-affected communities in particular have identified multiple risk factors for GBV at the individual, relationship, community, institutional and policy levels. These include male-dominated household decision-making and income, policies and laws that discriminate against women, and cultural norms that justify or condone the use of violence against women and girls as a form of conflict resolution or discipline. More importantly, in Somalia as well as project areas, GBV is experienced predominantly by women across all social and income groups. Owing to this fact, the DRIVE GBV risk assessment uses the Ecological Framework Model (EFM) taken from the 2017 World Bank GBV Task Force Report (see *Table 11-2*) to identify how the project may exacerbate existing SEA/SH risks or create new ones. That is, identifying and understanding project-related risk factors as they interact with other contextual risk factors is critical for development of appropriate prevention and mitigation measures in the project design. Given this EFM, it is expected that GBV risks in the project areas change over time, so it is essential they are continuously monitored throughout the project lifecycle.

Table 11-2: Risk factors that can contribute to SEA/SH in DRIVE project

SOCIETAL	***COMMUNITY***	***MALE PERPETRATOR***	***FAMILY***	***INDIVIDUAL***
DRIVE PROJECT-RELATED				
National, regional (a) Higher levels of GBV than regional average (b) Low education levels of national labor force (c)Limited services; low capacity for service provision for survivors; in particular, limited or no judicial or police services to facilitate redress for survivors (d) Lack of specific legislation addressing incidence of GBV	***Project size*** (a) Geographic span of projects and communities that the project affects (e.g., larger projects intersect with more communities and are harder to monitor) (b) Duration – longer term projects increase risk ***Project-affected population*** (a) Small host community, unable to absorb large influx of workers (b) Rural host community lacking access to services and institutions, low capacity for absorption (c) Unequal participation of community members in community consultations	***Project workers*** (a) Not local (b) Lack of sanctions for inappropriate behavior from employer (c)Increase in income of workers distorts power balance between workers and communities (d) Increase in income enables transactional sex and exploitative relationships	***Household relation*** Working with **only** men or women in a household	***Individual awareness*** Lack of information on how to report project-induced grievances

2.3 Prevalence and causes of GBV in DRIVE project areas

306. The prevalence and causes of GBV in Somalia in general and DRIVE project areas in particularly highly reflects the risk factors as sets out in the Ecological Framework Model explained above.

Magnitude of GBV

307. Gender-Based Violence (GBV) continues to be an issue of major concern Somalia and specifically in the Federal Members States of Galmudug, South West, Jubaland, Hirashebelle Puntland and in Somaliland. Recent spikes in Intimate Partner Violence, rape, sexual exploitation, sexual harassment and abuse have multiplied GBV risks for women and girls with worsening impact on women and girls living with disabilities (Advocacy Brief, UNFPA2021)[25].

Specific patterns in the prevalence of GBV

308. The following GBVA/SEA specific patterns of prevalence in GBV apply both to Somalia in general and DRIVE project areas in particular:

- The risk and prevalence of GBV is significantly higher for Women and girls than for men and boys.

[25] Overview of Gender Based Violence in Somalia. Developed by the United Nations Population Fund, 2021.

- Young women (those between the ages of 15-19), women who have never married, and women without children are more likely to experience SEA and SH as compared to older and married women.
- Rural women faced a larger magnitude of physical violence as compared to urban women in general.
- The extent of GBV based on socio-cultural and economic power differentials is higher for the pastoral communities in DRIVE project areas as compared to the national level.
- More than 95% of SEA/SE remains unreported for legal support or any other intervention.

Effectiveness of laws and policies

309. Somalia legal system is nascent with some relevant legislation in place that guarantee equal rights and prohibit most forms of gender-based violence (GBV), including SEA, SH, female genital mutilation (FGM), child marriage, most forms of rape, and some intimate partner violence (IPV). However, for many reasons, including the often-discordant levels of the formal and informal legal system, the general culture of acceptance of GBV, the poor training of law enforcement and judges, and the lack of institutional support behind the enforcement of the bans, the policies are widely ineffective at preventing GBV.

2.4 Potential DRIVE project-related SEA/SH risks

310. Given the Ecological Framework Model risk factors and the national and project areas contexts highlighted above, the implementation of the DRIVE project has the potential to create or exacerbate risks of varying forms of GBV, including SEA and SH:

- *Incidence of SEA:* Project beneficiaries or members of project-affected communities (women, girls, men and boys) may experience SEA. It is likely that the DRIVE project will introduce benefits or services to the project beneficiaries or the project-affected communities, either momentarily or indefinitely. Project workers may broker access to the benefits or services that are financed through the Bank. This creates a power differential between the project worker who uses access to the benefits or services to extract gain or favor from those who seek them. The power differential is created when a project worker has real or perceived power over a resource that can then be used to leverage or pressure any of the project beneficiary or member of the project-affected community into an unwanted sexual act. The project worker may use this differential power to extract sexual gain or sexually exploiting the project beneficiary or member of the local community.
- *Patriarchal system:* The long standing patriarchal system in the pastoral communities in DRIVE project areas may discriminate against women and girls during community engagement or in benefiting from the project services. Women and girls’ exclusion from subprojects preparation and implementation can result in project services that either ignores, or exacerbates, women and girls’ risks of GBV/SEA/SH in the project-affected communities.
- *Sexual exploitation and abuse in hiring, employment and retention practices:* Hiring and employment practices of women in different employment positions in the project – from skilled labor within contractors to community engagement officers – can expose women and girls to incidents of sexual exploitation (pressure to perform sexual acts in exchange for work), harassment, or violence.
- *GBV and Consent:* The possible risk that DRIVE project workers (contractor staff, subcontractor staff, supervising engineer) use threats, force or other forms of coercion, manipulation, deception, or misrepresentation; or threat to withhold the project benefit to which the person is already entitled in return for obtaining sexual service of the local women or female project staff.
- *Potential to create new GBV risks:* Local women and girls employed by the project may be at increased risk of becoming perpetrators of GBV. It is therefore important to consider broadly the range of potential perpetrators, combined with other contextual and project-related risks, to ensure projects integrate appropriate SEA/SH risk mitigation strategies.
- *Potential to exacerbate GBV risks:* There high potential that lack of awareness on the side of local community members, the labour influx of non-local people, lack of responsive institutions and weak legal sanctions exacerbate GBV risks in DRIVE project areas.

2.5 Assessing capacity to respond to SEA/SH

311. An adequate response to SEA/SH depends on the ability of the project to provide access to safe and ethical services for survivors. GBV service provider(s) and/or community-based organizations are critical not only for supporting the project in addressing any case of SEA/SH that may arise, but also in assisting the project to proactively prevent incidences of SEA/SH.

312. Project task teams should verify that the GBV service provider selected can offer services in accordance with international standards that articulate a minimum basic package of services, ideally including case management support, health services, psychosocial support, police support and security, access to legal services, and shelter, if needed. When identifying GBV service providers, the quality of service provision should be a key consideration. To maximize access to all appropriate services a survivor of GBV might need, a service provider should be able to actively refer survivors to other service providers, to enable the survivor to get the range of services that will provide a path to healing.

3. SEA/SH Prevention and Response Action Plan

313. For the project's GBV risks to be properly addressed, it requires effective SEA/SH Prevention and Response Action Plan guided by the following essential recommendations. The DRIVE project SEA/SH mitigation measures (***Table 11-1,***) are guided by the following key principles:

- *Be survivor-centered*: Approach considerations related to GBV prevention, mitigation and response through a survivor-centered lens, protecting the confidentiality of survivors; recognizing them as principal decision-makers in their own care; and treating them with agency, dignity and respect for their needs and wishes.
- *Emphasize prevention*: Adopt risk-based approaches that aim to identify key risks of SEA/SH and to undertake measures to prevent or minimize harm.
- *Build on existing local knowledge:* Engage community partners—local leaders, civil society organizations, gender and child advocates—as resources for knowledge on local-level risks, effective protective factors and mechanisms for support throughout the project cycle.
- *Be evidenced-based:* Build on existing global research and knowledge on how to address GBV effectively.
- *Be adaptable:* Adapt and adjust prevention and mitigation measures to respond to the unique drivers and context in any given setting, using the operational guidance presented in this GPN, which provides the foundation for an effective SEA/SH risk management approach.
- *Minimize harm to women and girls:* The project staff must be trained on how to preserve the safety of women while interviewing/collecting data on this topic. Women may suffer physical harm and other forms of violence if partners/perpetrators discover that they have been talking to others about their personal relationships. Because many violent partners/perpetrators control the actions of women with whom they are in a relationship, even the act of speaking to another person without their permission may trigger a woman's beating. As such, asking women about violence should be confidential, and should take place in complete privacy, with the exception of children under the age of two. Consent for any data collection, even as part of a case file, should be offered and if anonymity can be guaranteed, it should also be provided.
- *Enable continuous monitoring and learning*: Ensure operations integrate mechanisms for regular monitoring and feedback to track effectiveness and to build internal knowledge of what works to prevent, mitigate and respond to SEA/SH.

314. SEA/SH Prevention and Response Action Plan in outlines: how the project will put in place the necessary protocols and mechanisms to address the SEA/SH risks; and how to address any SEA/SH allegations that may arise.

- The Action Plan needs to include specific *arrangements* (see ***Table 11-3***) for the project by which SEA/SH risks will be addressed. This includes considerations such as:

- Awareness raising strategy, which describes how workers and local communities will be sensitized to SEA/SH risks, and the worker's responsibilities under the CoC;
- How the project will provide information to employees and the community on how to report cases of SEA/SH, in violation of the CoC, to the GM;
- The GM process for notifying the contractor of allegations; and
- GBV service providers to which GBV survivors, including SEA/SH survivors, will be referred, and the services which will be available.

315. Likewise, the SEA/SH Prevention and Response Action Plan should include an *Accountability and Response Framework* (see ***Table 11-4***) which details how allegations of SEA/SH will be handled (investigation procedures) and disciplinary action for violation of the CoC by workers. The Accountability and Response Framework should include:

- How allegations will be handled, in what timeframe, and the range of possible disciplinary actions for violation of the CoC by workers, taking account of due process;
- Procedures to report SEA/SH allegations internally for case accountability;
- A referral pathway to refer survivors to appropriate support services; and
- Procedures that clearly lay out confidentiality requirements for dealing with cases.

Table 11-3: Recommended Actions to Address DRIVE Project Induced SEA/SH Risks

When	***Actions to Address SEA/HE Risks***	***Timing for Acton***	***Who is Responsible For Action***	***Ongoing Risk Management***	***Whether Action is Recommended or Advisable by SEA/SH Risk Level***			
					Low	Mod.	Subst.	High
Identification/Appraisal	**Sensitize the IA** as to the importance of addressing SEA/SH in the project, and the mechanisms that will be implemented.	• Preparation • Implementation	• Task Team	Task Team to monitor and provide additional guidance as necessary	✓	✓	✓	✓
	Include in the **project's social assessment** an assessment of the underlying SEA/SH risks and social situation, using the SEA/SH Risk Assessment Tool to provide guidance and keeping to safety and ethical considerations related to GBV data collection. No prevalence data or baseline data should be collected as part of risk assessments.	• Preparation. • Implementation (before civil works commence). • PCN and QER/Decision Review (SEA/SH Risk Assessment Tool)	• Implementing Agency for social assessment and ESMP. • Contractor for C-ESMP. • Task Team for SEA/SH Risk Assessment Tool	• Ongoing review during implementation support missions. • Update project ESMP and C-ESMP if risk situation changes	✓	✓	✓	✓
	Map out GBV prevention and response actors in communities adjoining the project. This should incorporate an assessment of the capabilities of the service providers to provide quality survivor-centred services, including GBV case management, acting as a victim advocate, providing referral services to link to other services not provided by the organization itself.	• Preparation • Implementation	• Implementing Agency	• Update mapping as appropriate	✓	✓	✓	✓
	Are SEA/SH risks adequately reflected in all **E&S project documentation** (i.e., Project ESMP, C-ESMP). Include the	• Preparation • Implementation (before civil	• IA for social assessment and ESMP	Ongoing review during implementation support missions	✓	✓	✓	✓

When	***Actions to Address SEA/HE Risks***	***Timing for Acton***	***Who is Responsible For Action***	***Ongoing Risk Management***	***Whether Action is Recommended or Advisable by SEA/SH Risk Level***			
					Low	Mod.	Subst.	High
	GBV service provider mapping in these instruments.	work commence)	• Contractor for C-ESMP					
	Review the **IA's capacity** to prevent and respond to SEA/SH as part of **safeguard preparation**.	• Preparation • Implementation	Task Team	Ongoing review during implementation support missions	✓	✓	✓	✓
Identification/Appraisal	Develop a **SEA/SH Prevention and Response Action Plan** including an **Accountability and Response Framework** as part of the ESMP. The contractor/consultant's response to these requirements will be required to be reflected in the C-ESMP.	• Preparation • Implementation (before civil work commence)	Implementing Agency	Ongoing review during implementation	✗	✓	✓	✓
	As part of the **project's stakeholder consultations, property inform those affected by the project of SEA/SH risks** and project activities to get their feedback on project design and safeguard issues. Consultations need to engage with a variety of stakeholders (political, cultural or religious leaders, health teams, local councils, social workers, women's organizations and groups working with children) and should occur at the start and throughout the implementation of the project.	Consultations need to be throughout the project cycle, not just during preparation.	Implementing Agency	• Monitoring of implementation of SEP. • Ongoing consultations, particularly when C-ESMP is updated.	✓	✓	✓	✓
	Specifically address SEA/SH-related issues **in** the **SEP** of the project, which will be implemented over the life of the project to keep the local communities	Consultations need to be throughout the project cycle, not	Implementing Agency	• Monitoring of implementation of SEP. • Ongoing consultations,	○	○	✓	✓

When	*Actions to Address SEA/HE Risks*	*Timing for Acton*	*Who is Responsible For Action*	*Ongoing Risk Management*	*Whether Action is Recommended or Advisable by SEA/SH Risk Level*			
					Low	Mod.	Subst.	High
	and other stakeholders informed about the project's activities.	just during preparation.		particularly when C-ESMP is updated.				
	Make certain of the availability of an **effective GM** with multiple channels to initiate a complaint. It should have specific procedures for SEA/SH, including confidential reporting with safe and ethical documenting of SEA/SH cases. Parallel GM outside of the project GM may be warranted for substantial to high risk	Prior to contractor mobilizing	Implementing Agency, but discussed and agreed upon with the Task Team.	Ongoing monitoring and reporting on GM to verify it is working as intended.	✓	✓	✓	✓
	Ensure **IA has a GBV specialist** to support project implementation.	Preparation	Implementing Agency	Ongoing reporting	✗	○	✓	✓
	For **supervision,** have a **social /environmental specialist** in the supervising Engineer's team with **GBV specific** skills to supervise issues related to SEA/SH (e.g. supervise signing of CoCs, verify working GM for SEA/SH is in place, refer cases where needed) and work with GBV service providers as entry points into service provision to raise awareness of the GM.	During procurement evaluation process.	Implementing Agency	Ongoing reporting	✗	○	✓	✓
Identification/Appraisal	**Ensure oversight** through an independent **Third Party Monitoring (TPM) organization/Independent Verification Agent (IVA)** (civil society organization, international or local NGO, academic partner, private sector	Preparation	Implementing Agency	Ongoing reporting	✗	✗	○	✓

When	*Actions to Address SEA/HE Risks*	*Timing for Acton*	*Who is Responsible For Action*	*Ongoing Risk Management*	*Whether Action is Recommended or Advisable by SEA/SH Risk Level*			
					Low	Mod.	Subst.	High
	firm) **with experienced GBV staff** to monitor implementation of the SEA/SH Prevention and Response Action Plan and ensure all parties are meeting their responsibilities.							
	Ensure funding is available for IA to recruit GBV service providers to facilitate access to timely, safe and confidential services for survivors (including money for transportation, documentation fees, and lodging if needed).	Preparation	Implementing Agency	Implementing Agency	⊗	⊗	○	✓
Identification/Appraisal	For projects that do not use loan/credit/grant proceeds to hire GBV service providers at the start of project implementation, encourage Borrowers to include an escalation clause in the general contract terms and the ESCP should SEA/SH risks become apparent over the course of the project implementation.	Preparation	Task Team	Task Team	✓	✓	✓	✓
	Clearly define the SEA/SH requirements and expectations in the **bid documents.**	Procurement	Implementing Agency	Review by Task Team	✓	✓	✓	✓
	Based on the project's needs, the Bank's SPDs, and the IA's policies and goals, define the requirements to be included in the bidding documents for a **CoC which addresses SEA/SH**.	Procurement	Implementing Agency	Review by Task Team	✓	✓		✓
	For **National Competitive Bidding (NCB) procurement,** consider integrating the International Competitive	Procurement	Implementing Agency	Implementing Agency with Review by Task Team	○	○	✓	✓

When	*Actions to Address SEA/HE Risks*	*Timing for Acton*	*Who is Responsible For Action*	*Ongoing Risk Management*	*Whether Action is Recommended or Advisable by SEA/SH Risk Level*			
					Low	Mod.	Subst.	High
Procurement	Bidding (ICB) SPD requirements for addressing SEA/SH risks.							
	Set out clearly in the procurement documents how adequate SEA/SH-related costs will be paid for in the contract. This could be, for example, by including: (i) line items in bill of quantities for clearly defined SEA/SH activities (such as preparation of relevant plans) or (ii) specified provisional sums for activities that cannot be defined in advance (such as for implementation of relevant plan/s, engaging GBV service providers,	Procurement	Implementing Agency	Review by Task Team	✓	✓	✓	✓
	Clearly explain and define the requirements of the bidders' **CoC** to bidders before submission of the bids.	Procurement	Implementing Agency	Review by Task Team	✓	✓	✓	✓
Procurement	**Evaluate the contractor's SEA/SH Accountability and Response Framework** in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's SEA/SH prevention and response requirements.				✗	✓	✓	✓
	Review C-ESMP to verify that appropriate mitigation actions are included.	Implementation	Implementing Agency (IA)	• Review by IA • Review by Task Team	✓	✓	✓	✓
	Review the GM's reception and processing of complaints to ensure that the protocols are being followed in a timely manner, referring complaints to	Implementation	• Implementing Agency • Task Team	• Ongoing reporting • Monitoring of complaints and their resolution	✓	✓		✓

When	*Actions to Address SEA/HE Risks*	*Timing for Acton*	*Who is Responsible For Action*	*Ongoing Risk Management*	*Whether Action is Recommended or Advisable by SEA/SH Risk Level*			
					Low	Mod.	Subst.	High
Implementation	an established mechanism to review and address SEA/SH complaints.							
	Codes of Conduct signed and understood 1) Ensure requirements in CoCs are clearly understood by those signing. • Have CoCs signed by all those with a physical presence at the project site. • Train project staff on the behavior obligations under the CoCs. • Disseminate CoCs (including visual illustrations) and discuss with employees and local communities. • Create an appropriate Accountability and Response Framework.	Initiated prior to contractor mobilization and continued during implementation.	Contractor, Consultant, Implementing Agency	• Review of SEA/SH risks during project supervision (e.g., Mid-term Review) to assess any changes in risk. • Supervising Engineer reporting that CoCs are signed and that workers have been trained and understand their obligations. • Monitoring of GM for SEA/SH complaints. • Discussion at public consultations.	✓	✓	✓	✓
	Have project workers and local community undergo **training** on SEA/SH.	Implementation	Implementing Agency, Contractors, Consultants.	Ongoing reporting	✓	✓	✓	✓
	Undertake regular **M&E** of progress on SEA/SH prevention and response activities, including reassessment of risks as appropriate.	Implementation	Implementing Agency, Contractors, Consultants.	• Monitoring of GM • Ongoing reporting	✓	✓	✓	✓
Implementation	Implement appropriate **project-level activities** to reduce SEA/SH risks prior to civil works commencing such as:	Prior to works commence	• Contractor (implementation)	• Ongoing reporting.	○	✓	✓	✓

When	*Actions to Address SEA/HE Risks*	*Timing for Acton*	*Who is Responsible For Action*	*Ongoing Risk Management*	*Whether Action is Recommended or Advisable by SEA/SH Risk Level*			
					Low	Mod.	Subst.	High
	• **Have separate, safe and easily accessible facilities for women and men working on the site**. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. • **Visibly display signs around the project site** (if applicable) that signal to workers and the community that the project site is an area where SEA/SH is prohibited. • As appropriate, ensure public spaces around the project grounds are **well-lit.**		• Supervising Engineer (supervising /enforcing contract) • Task Team.	• Reviews during implementation support missions.				

 = Actions are recommended given the risk level

 = Actions that should be considered to be done, and adopted if appropriate, given the nature of the project and the associated risks;

 = Actions are unlikely needed given risk level

Table 11-4: Proposed Reporting of SEA/SH During Implantation

Who	*To Whom*	*What*	*When*	*Objective*
GM Operator	Implementing Agency (and IA to furnish to Bank)	Reporting of SEA/SH allegations with four key data: • Nature of the case; • Project-related (Y/N); and • Age and/or sex (if available). • Whether the survivor was referred to services.	As soon as becomes known	• For Implementing Agency to monitor response. • For Bank to report to management in accordance with ESIRT
GBV Service Provider (contracted to project)	Implementing Agency and supervising engineer	Aggregate data on case load: • Number of SEA/SH cases received/referred by the GM, disaggregated by age and by sex; • The number of cases open, & the average time they have been open; & • The number of cases closed, and the average time they were open.	Monthly	To ensure accountability of GBV service provider particularly if financial support is being provided for survivor support.
Supervising Engineer	Implementing Agency	• Status on the implementation of project's SEA/SH Prevention and Response Action Plan; • The agreed project SEA/SH indicators, e.g.: - That the GM is functioning correctly for receiving and resolving complaints. - The GM indicators. - That an appropriate mechanism to resolve SEA/SH complaints is established and functional. - Percentage of workers that have attended CoC training • Successful implementation of agreed SEA/SH Prevention and Response Action Plan (Y/N); • Number of training courses related to SEA/SH delivered; • Percentage of workers that have signed a CoC; and/or	Monthly	Part of overall supervising Engineer's duty to monitor day-to-day activities and implementation of project's CoC.
Implementing Agency	Bank	• Project SEA/SH indicators; and • GM indicators (as supplied by the supervising Engineer)	In line with project legal agreement	In accordance with the standard project Results Framework reporting.
TPM/IVA (if applicable)	Implementing Agency (IA) (and IA to furnish to Bank)	• The implementation of the SEA/SH Prevention and Response Action Plan; • The functioning of an appropriate mechanism to address and resolve SEA/SH complaints; • The functioning of the GBV service provider; and • The functioning of the GM and the status of GM indicators related to SEA/SH.	Quarterly	Part of overall duty of TPM/IVA to monitor implementation of the CoC.

11.7 Annex VII: Gender Based Violence Code of Conduct (CoC)

Code of Conduct for Contractors and the SEA/SH Prevention and Response Action Plan

1. To build a system for SEA/SH risk prevention and mitigation, projects must:
   - Have all employees of contractors (including sub-contractors), supervising Engineers and other consultants with a footprint on the ground in the project area sign CoCs;
   - Have an effective SEA/SH Prevention and Response Action Plan so that workers understand behavior expectations and policies, as well as an effective GM. This Action Plan should include training and communication. It should also include plans to make the project-affected community aware of the CoC the project staff have just signed; and
   - As part of the SEA/SH Prevention and Response Action Plan, define accountability and response protocols, which set out the procedures followed for holding individuals accountable and penalizing staff that have violated SEA/SH policies.

Part I: Code of Conduct from Standard Procurement Document (SPD)

Code of Conduct for Contractor's Personnel (ES) Form

Note to the Employer:

- *The following minimum requirements shall not be modified. The Employer may add additional requirements to address identified issues, informed by relevant environmental and social assessment.*
- *The types of issues identified could include risks associated with: labor influx, spread of communicable diseases,* Sexual Exploitation and Sexual Abuse (SEA) *etc.*
- *Delete this Box prior to issuance of the bidding documents.*

Note to the Bidder:

- *The minimum context of the Code of Conduct form as set out by the Employer shall not be substantially modified. However, the Bidder may add requirements as appropriate, including to take into account Contract-Specific issues/risks.*
- *The Bidder shall initial and submit the Code of Conduct form as part of its bid.*

Code of Conduct for Contractor's Personnel

We are the Contractor, [*enter name of Contractor*]. We have signed a contract with [*enter name of Employer*] for [*enter description of the Works*]. These Works will be carried out at [*enter the Site and other locations where the Works will be carried out*]. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation and abuse and gender-based violence.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as "**Contractor's Personnel"** and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor's Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor's Personnel shall:

1. carry out his/her duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
3. maintain a safe working environment including by:
    a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
    b. wearing required personal protective equipment;
    c. using appropriate measures relating to chemical, physical and biological substances and agents; and
    d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
7. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank-financed projects/operations, sexual exploitation occurs when access to or benefit from Bank-financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain;
8. not engage in Rape, which means physically forced or otherwise coerced penetration—even if slight—of the vagina, anus or mouth with a penis or other body part. It also includes penetration of the vagina or anus with an object. Rape includes marital rape and anal rape/sodomy. The attempt to do so is known as attempted rape. Rape of a person by two or more perpetrators is known as gang rape;
9. not engage in Sexual Assault, which means any form of non-consensual sexual contact that does not result in or include penetration. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation, and Sexual Abuse (SEA);
11. report violations of this Code of Conduct; and
12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the [Project Grievance [Redress] Mechanism].

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Contractor's Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters*] in writing at this address [ ] or by telephone at [ ] or in person at [ ]; or
2. Call [ ] to reach the Contractor's hotline *(if any)* and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR CONTRACTOR'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of Contractor's contact person with relevant experience in handling gender-based violence*] requesting an explanation.

Name of Contractor's Personnel: [insert name]
Signature: ____
Date: (day month year): ____
Countersignature of authorized representative of the Contractor:
Signature: ____
Date: (day month year): ____

Part II: Contents of a SEA/SH Prevention and Response Action Plan

As described in Section 10, the SEA/SH Prevention and Response Action Plan is outlines how the project will put in place the necessary protocols and mechanisms to minimize the risk of exacerbating SEA/SH in the project, as well as to address any SEA/SH issues that may arise.

11.8 Annex VIII: Chance Find Procedure

Chance find procedures will be used as follows:

a. Encounter or detection of a Physical Cultural Resources (PCR).
b. Stop the construction activities in the area of the chance find;
c. Delineate the discovered site or area;
d. Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities take over;
e. Notify the supervisory Engineer who in turn will notify the responsible local authorities (within 24 hours or less);
f. The responsible local authorities would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archeologists (within 24 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values;
g. Decisions on how to handle the finding shall be taken by the responsible local authorities. This could include changes in the layout (such as when finding an irremovable remain of cultural or archeological importance) conservation, preservation, restoration and salvage;
h. Implementation for the authority decision concerning the management of the finding shall be communicated in writing;
i. These procedures must be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer / Public Works Engineer (PWE) shall monitor the above regulations relating to the treatment of any chance find encountered are observed;
j. Construction work will resume only after authorization is given by the responsible local authorities concerning the safeguard of the heritage; and
k. Relevant findings will be recorded in World Bank Implementation Supervision Reports (ISRs), and Implementation Completion Reports (ICRs) will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

11.9 Annex IX: Security Management Plan

Introduction

The Federal Government of Somalia (FGS) is preparing the De-Risking, Inclusion and Value Enhancement of Pastoral Economy in the Horn of Africa Project (DRIVE) to be financed by International Development Association IDA to the tune of US$70 Million. The DRIVE project will support the provision of financial de-risking in anticipation of drought (i.e., insurance and financial services) for the main asset of pastoralists -livestock- to allow them to invest in their herds. It will also better connect pastoral production groups with markets, support trade infrastructure for cross-border and small-scale trade and strengthen capacity to meet international standards requirements. This will enable pastoral production groups to extract greater value addition from livestock-rearing activities. The main beneficiaries will be pastoral production groups in the Horn of Africa (HoA) generally, and Somalia specifically, that have the capacity to undertake commercial activities and move up the value chain.

The project will be implemented by the Federal Government of Somalia through the Ministry of Finance Ministry of Livestock, Forestry and Range, Ministry of Commerce, Somalia Bureau of Standards, Central Bank of Somalia and participating Federal Member States on relevant activities. The SCALE UP Project Implementation Unit (PIU) within the Ministry of Finance will coordinate the project's implementation in the interim.

Security Context in Somalia

Somalia was in second place out of 179 countries in the states fragility index of 2021 with a score of 110.9 out of maximum score of 120, and no change from previous year of 2020.

There is significant conflict at different levels in the country. Some insecurity stems from clan competition, and the distrust emanating from the weakening of the societal relations since the fall of central government in 1991, exacerbating the negative central role of clan and clan competitions, and the breakdown of law and order, giving a huge space to anti-peace elements.

The FGS, supported by the African Union's AMISOM force (and now rebranded to ATMIS) and other foreign militaries, continue to be engaged in a challenging internal armed conflict with Al Shabaab militants, (AS). AS controls or influences large swaths of rural areas in south and central Somalia. AS also maintains a significant presence in Northern Puntland, where Islamic State has a footprint. These AS influenced areas are generally beyond urban centres secured by AMISOM, FMS or FGS forces. As a consequence, AS is able to move relatively freely throughout the territory. This, in turn, has given them freedom of movement and freedom of action to exert additional kinetic events and pressure into the Mogadishu, the seat of the Federal government, putting government in near perpetual off-balance.

Recovering state institutions, undermined by decades of fragility in the past, are hamstrung in their ability to mitigate threats to human security. Leading to a diversified contextual insecurity necessitating project risks assessments and mitigation, where complex sub-clan dynamics playout and decentralized militias exercise considerable influence.

AS is not only opposing the FGS, but all partners of FGS, which includes development partners. This has significant impact on project delivery as freedom of movement beyond main town centres are limited, as frontline workers will be constrained.

The dissonance between the FGS and some FMS will invariably give space to spoiler networks, disrupting fledgling governance capacity, further undermining the ability of the Somali security forces to reinforce security across the context. The state security apparatus is in development and in some cases influenced by clan considerations, especially as the older soldiers are still stuck in clan militias' mindset and have little refresher trainings. The distinctions between the state security apparatus, local militia or other armed factions can be blurred. In addition, clan elders will often maintain complex networks in their relations with both Government, local militia and AS commanders in their respective areas. Militant attacks, hijackings, abductions, killings and extortion are a frequent occurrence in many areas of the context.

In terms of freedom of movement for civilian populations, different armed groups maintain checkpoints along key arteries of the country to extract fees from travelers. This reduces the ability of Somalis to travel longer distances to obtain essential services.

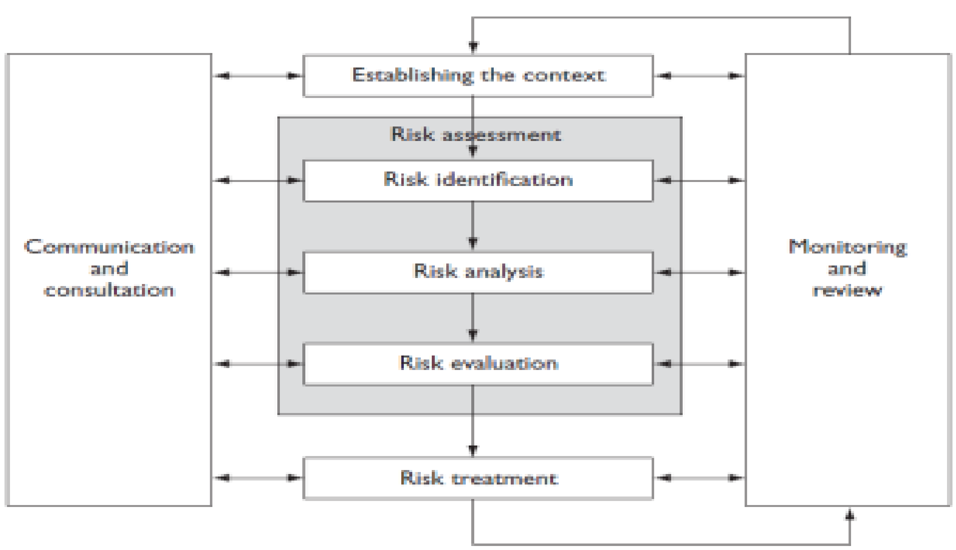
Government checkpoints can also be seen as problematic, as they are often subject to important bottlenecks. As a consequence of the uncertain nature of security actor environment, the use of security forces for project-related protection and movement could present direct risks to project workers and communities.

Drive Activity Description

Majority of DRIVE activities to be implemented in Somalia is analytical works. Component 1 which will be implemented by ZEP Re, has relatively limited direct impacts and is not expected to have significant indirect and induced adverse environmental impacts on human populations and/or the biophysical environment. Pastoralists would use insurance pay-outs to provide for their livestock during the early stages of drought, reducing the need for movement and tensions between pastoral communities. This is expected to reduce stress on scarce resources, reduce cross-border competition for scarce natural resources enhance resilience and decrease the risk of conflict during droughts when pastoralists cross borders. Component 2 is mostly technical assistance.

Methodology

The SecRA methodology will follow five steps for ease of breaking down into methodical units; this is in line and in accordance with ISO 31000, Risk Management – Guidelines and ESS4.



ISO 31000 Risk Management Guideline

1.	**Identify Critical Assets.** In this case it is the lives and the safety of the Project affected personnel.
2.	**Identify Threat Scenarios.** Security threats to the project are identified and the principal threat scenarios are described.
3.	**Threat Likelihood and Impact.** The threat scenarios identified in the previous stage are ranked in a matrix according to their likelihood and impact.
4.	**Vulnerability Assessment.** The project's vulnerability to each of the identified threat scenarios is assessed and ranked in terms of the effectiveness of the mitigation measures currently in place.
5.	**Current Risk Exposure.** The Likelihood, Impact and Vulnerability scores are combined to define the current, pre-treatment risk score.
6.	**Post Risk Exposure – Incorporating Local SMP risk mitigation measures**. Working off the risk scores identified in step 5, a local SMP is written providing risk mitigation measures for each identified threat scenario. This results in a new vulnerability score for each threat scenario. This revised score is combined with the earlier Likelihood and Impact scores to give a new risk score.

Six sub-steps of Risk Assessment Process

Step 1 Critical Assets

Risk assessments solely concern themselves with the safety and security of the lives of project affected personnel, as well as property. These are the critical assets against which the likelihood/ impact of, and vulnerability to, a specific threat scenario is measured.

Step 2 Threats and Scenarios

Threat Scenarios are identified by Open Source Intelligence (OSINT) Collection and Analysis. The security expert, who is a native Somali language speaker, which affords him access to all local reporting across news outlets and social media feeds. There is also the networking within the security industry practitioners combined with feeds from FGS, UN and NGO community provides an unparalleled understanding of the security situation in the country. It is from these feeds on security incidents and an understanding of malign actors Tactics, Techniques and Procedures (TTPs) that derives the Threat Scenario Lists.

In accordance with the ESF Good Practice Note[26] SecRAs should also include: i) an assessment of risks to workers and the community from security personnel; ii) preliminary recommendations for prevention

[26] World Bank 'ESF for IPF Operations. Assessing and Managing the Risks and Impacts of the Use of Security Personnel, Good Practice Note http://documents.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English.pdf

and mitigation; and iii) an institutional and legal analysis of security related legislation. The Project will ensure conformity with the World Bank ESS4 on security personnel.

The PIU will not sanction any use of force[27] by direct or contracted workers tasked with providing security, except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. With the support of the security consultant, the PIU will make a detailed analysis of the threat posed by the potential inclusion of official security actors within Project operations.

The PIU shall ensure that the requirements set out in the Environmental and Social Commitment Plan (ESCP) are fully respected by all contracted and direct staff.

Threat to movements

These threats are specific to movement of project personnel to and from project sites; eg

THREAT TYPE	DEFINITION
VBIED	Attack on project workers whilst either travelling to or from the project site or whilst moving project equipment by a Vehicle Borne Improvised explosive (VBIED) device delivered to the target by a suicide bomber or in a parked vehicle detonated by a timer.

Table 3: Example of threat to movement

Threat to work site

These threats are specific to work sites - Semi permanent locations, utilised for a defined period of time whilst project works are ongoing, eg

THREAT TYPE	DEFINITION
Complex Attack/ Ambush	Assault on work site by one or more groups of attackers armed with automatic weapons and possibly RPG 7 rockets and grenades. Scenario assumes that the attackers aim is to cause maximum fatalities.

Example of threat to work site

Threat to Local population

Any local population whose security is adversely affected by the presence of project activity. In these scenarios it is assumed the local population is directly targeted due to project activity, eg

THREAT TYPE	DEFINITION
Indirect Fire attack (IDF)	Mortar fire or air burst RPGs directed onto the local population surrounding work site due to project activity.

Example of threat to local population

Threat Likelihood and Impact

[27] Please refer to UN guidelines on use of force, and UN's OHCHR

This section of the report assesses the likelihood of a threat occurring and the impact of the consequences. It assigns likelihood and impact scores to each identified threat scenario, for each category of project affected personnel.

Risk/threat likelihood and impact are rated on a scale of 1 to 5, the criteria for these ratings can be seen below. Tables should be developed for each identified risk category, per region.

Likelihood Score	Likelihood	Definition
1	VERY IMPROBABLE	The risk will occur only in the most exceptional circumstances
2	IMPROBABLE	The risk is not expected to occur in most circumstances
3	MODERATELY PROBABLE	The risk will occur in some circumstances
4	PROBABLE	The risk will occur in most circumstances
5	VERY PROBABLE	The risk will occur in just about all circumstances

Risk Probability Score

Impact Score	Impact	Definition
1	NEGLIBLE	Insignificant injuries or health effects
2	MINOR	Minimal injuries or health effects
3	MEDIUM	Moderate injuries or health effects
4	SEVERE	Permanent disability and/or multiple hospitalizations, major health effects
5	CRITICAL	Fatalities, multiple permanent disabilities or multiple hospitalizations, major health effects

Risk Impact Score

Risk Matrix		**Impact**				
		Negligible	**Minor**	**Medium**	**Severe**	**Critical**
PROBABILITY	**Very Probable**	**Low**	**Moderate**	**Substantial**	**High**	**Unacceptable**
	Probable	**Low**	**Moderate**	**Substantial**	**Substantial**	**High**
	Moderately Probable	**Low**	**Low**	**Moderate**	**Substantial**	**Substantial**
	Improbable	**Low**	**Low**	**Low**	**Moderate**	**Moderate**
	Very Improbable	**Low**	**Low**	**Low**	**Low**	**Low**

Risk Matrix

Risk Matrices

In consultation with the PIU, the Consultant will use only those risk categories that are **considered** relevant to the Project. Some of the recorded risks prevalent in Somalia include:

1. VBIED
2. PBIED
3. Complex attack/ambush
4. IED
5. Intimidation/extortion
6. Workplace violence
7. Gender-based violence/SEAH
8. Kidnap
9. Armed robbery/raid
10. Compound takeover/hostage taking

NB: The Risk Matrices in this document, including their ratings, are based on untreated levels of risk – i.e. prior to mitigation/ SMP.

Project Location ***(insert name & replicate for each location) eg (Kismayo, Jubaland)***

Risk matrix		**Impact**				
		Negligible	**Minor**	**Medium**	**Severe**	**Critical**
Likelihood	**Very probable**			**7**		**1,2,3,4**
	Probable		**6,10**	**8,9,**		
	Moderately probable				**5**	
	Improbable					
	Very improbable					

Untreated Risk Matrix Table

Security Clearance Processes

Prior to the implementation of activities, the PIU will provide a no objection to relevant contractor ASP.

Roles and Responsibilities.

Activites	Party Responsible	Timeframe	Budget
• Asses the overall risk to project personnel and community.	• PIU and consultant	• All screenings to be done three(3) months after effectiveness and before the use of any securty personnel	$10,000
• Assess the risks and impacts of engagement of the military and security personnel.	• PIU and consultant		$10,000
• screen such personnel to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force.	• PIU and Consultant		$10,000
• Adopt and enforce standards, protocols, and codes of conduct for the selection and use of military and security personnel.	• PIU and security consultant	• Three months after effectiveness.	$20,000
• Ensure that such personnel is adequately instructed and trained, prior to deployment.	• PIU and consultant	• Throughout the project implementation.	$20,000
• Ensure that any concerns or grievances regarding the conduct security personnel are received, monitored, documented (confidentialy), and resolved through the Project's grievance mechanism.	• PIU	• Throughout the project implementation.	To be within the GM budget.

Duty of Care and Decision-Making Processes

Duty of Care

The respective Government entities, the Ministries of Education and Health, have a duty of care for their direct workers. All other IPs and Contractors, such as local and international NGOs, and UN agencies, where applicable, share a duty of care for their contracted workers.

However, the PIU Coordinator bears overall responsibility for the implementation of all security risk mitigation measures. The PIU Coordinator will be responsible for ensuring compliance by all Project workers and IP/Contractors Project SecMP as well as activity security plan. As Project Coordinator, he will task the security consultant who will be located in the PIU, to monitor and supervise the implementation of all security requirements by all involved Governmental agencies and other IPs, i. The Security Consultant will work closely with the Environmental and Social Team in the PIU on environmental and social risk management and GBV/SEAH related matters. The Security Consultant will maintain a working relationship with the World Bank's Safeguards staff through the PIU.

Through the daily responsibilities of the Security Consultant, the PIU will monitor all IP and Contractor implementation of security measures and ensure that security protocols - as stipulated in the SecMPs - are adhered to by all entities. Continued transfer of project funds will be subject to the implementation of this SecMP and other instruments, as well as other Safeguards measures. The PIU's Security Consultant will undertake regular monitoring field missions to Project sites.

Decision-Making Processes

Security for all Project Workers and Project-Affected Parties will largely depend on decisions over the timing, duration and location of Project activities at the community level. The PIU Project Coordinator – after consultations with the PIU Security Consultant, line ministries and project steering committee has the power and obligation to take decisions on the commencement, suspension or postponement of activities if insecurity prevails in specific locations which threatens or is likely to threaten the security of Project Workers and Project-Affected Persons. The Project SecMP will include a list of specific 'triggers' that lead to specific counter measures and consequent Project adjustments.

All contractors retain the right to take their own internal decisions on the suspension of activities due to prevailing insecurity and with the view to protecting their respective workers and project communities. Their decisions should be informed by their respective security advisors and decisions should be taken in consultation with the PIU. While the PIU can instruct contractors to suspend activities, the PIU and the beneficiary institution cannot prevent contractors, where applicable, from taking decisions to suspend activities if Contractors legitimately assess the environment as too insecure for the continued implementation of activities.

- Security-related decisions can include:
- whether to suspend project activities in certain areas,
- whether to commence project activities in high risk areas,
- and how to respond to arising security risks (e.g. decisions on evacuation from project areas).

Minimum Conditions for Implementation

Minimum conditions will apply for implementation of project activities in specific States, Regions and Districts. These criteria include: (i) that the implementing agencies have full access to all areas in a District and that full access is possible for project workers; (ii) that advice on Project implementation has been communicated to all relevant government authorities,– depending on what is reasonable for the level of intervention) in view of guarantees of safety of staff and project-affected communities; (iii) that the government engages representatives from communities selected for the implementation of activities to improving the security of the working environment; and (iv) that no Project implementation area is assessed to be under the direct control of AS or other armed militants opposed to the FGS.

In cases of decisions taken by Contactors to exit a project area due to heightened insecurity and risk levels (see above decision-making process), appropriate communication with the PIU and beneficiary institution will be made to propose alternative options. A clear communication protocol for this purpose will be established. Such communication will be conducted through appropriate mechanism. (see also Stakeholder Engagement Plan - SEP).

General Protection Measures for Project Workers and Project-Affected Persons

Direct Workers

Direct workers will come under protection of their respective institutions, where security interventions are required; the government will take the necessary decision.

Insurance: The PIU will decide on the feasibility of engaging the services of an insurance provider to protect Direct Workers through medical and MEDVAC coverage.

Communication Equipment: – The provision of VHF/HF, satellite and GSM phones, Dish/WiFi Internet will be provided by the PIU where communications equipment is required. A Security Consultant shall advise the PIU on these measures.

All Direct Workers will be expected to enroll in and complete training courses related to security and safety procedures to ensure that the personnel are aware of the risks in their operational contexts and of ways in which these can be mitigated.

Contracted Workers

In accordance with ESS4, the responsibilities for security management, as set out in the relevant security management plans, will be cascaded down to the FMS. The PIU will put in place necessary risk mitigation measures, including training, insurance, residential measures, and security communication equipment.

As part of the contracting process, the PIU will share the minimum-security requirements with the potential contractors to ensure adequate security measures are put in place. And should provide a security management plan for their activities. A Security consultant should be available to assist the PIU in these measures.

Pre-deployment Safety training: The PIU will require all contractors involved in the implementation process to conduct basic security training related to security procedures to ensure that personnel are aware of the risks in their operational contexts and of ways in which these can be mitigated.

Community Workers and Project-Affected communities

Duty of Care will be provided by the respective institutions to community workers, where and when they are engaged. With a view to the risks of community workers or project-affected parties, the decision makers will consider the suspension of project activities if project activities expose either community workers or project-affected persons to unacceptable levels of risks (see SecRA). The PIU, relevant institutions will decide on the suspension of activities in close consultation with the project steering committee.

The Project has elements on community involvement and local community buy-in to build strong ownership and commitment by communities through the government authorities. Significant support to be provided to ensure community mobilization/sensitization, community buy-in, and community capacity building – as per the Community Engagement Plan/ Stakeholder Engagement Plan and capacity building strategy - to standardize and form coherent mobilization and communication approaches across project locations.

There may be security risks for community workers and other project-affected parties that relate to their role in the project. For example, community workers could be subject to attacks or kidnapping because of their association with the Government's activity or campaign.

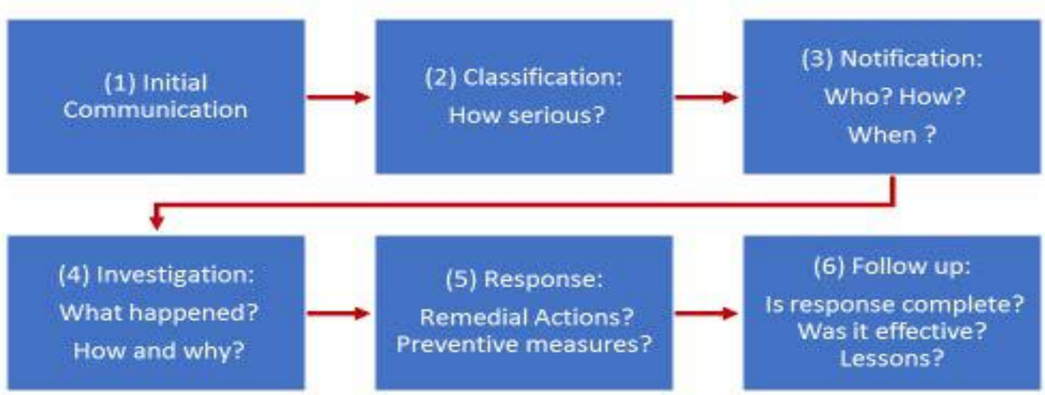
Monitoring, Compliance, Inspections and Reporting

On behalf of the MOF, the PIU is responsible for the management of the security consultant. The PIU will oversee and direct the Security Consultant in the performance of all of its security tasks. It will assist monitoring and implementation of security management plan.

The PIU will be responsible for the regular monitoring of compliance with the SecMP implementation of all government departments, IPs, Contractors and, where engaged operationally. The Project SecMP will be reviewed on an annual basis or after the occurrence of a significant security incident. The review will allow for a post-incident Lessons Learnt Exercise (LLE) and for the potential adjustment of SecMPs and broader operational strategies, where necessary. Annual reviews will ensure SecMPs remain fit for purpose and can be adjusted to newly arising security challenges.

The PIU will promptly notify the concerned stakeholders of any incident or accident - including security incidents - related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. This includes any potential Project-related occupational health and safety accidents and incidents or GBV/SEAH or child labor, in accordance with LMPs and ESMPs, the instruments referenced therein and the Environmental and Social Standards. A significant security incident would include (a) violent attacks at health/school facilities, (b) incidents involving the use of improvised explosive devices, (c) kidnapping of personnel, (d) carjacking, (e) violent attacks meted against healthcare/education/schools' staff at work in the project, and (f) other violent incidents that results in injuries and/or deaths at the project activity facilities or loss of property.

The incident/ accident reporting will follow the management and reporting process shown in the table below.



Incident Reporting Matrix

Incidents will be categorized into 'indicative', 'serious' and 'severe'. Indicative incidents are minor, small or localized that negatively impact a small geographical area or a small number of people and do not result in irreparable harm to people or the environment. A 'significant' incident is one that causes significant harm to the environment, workers, communities, or natural resources and is complex or costly to reverse. All GBV/SEAH cases are treated as severe. A 'severe' incident causes great harm to individuals, the affected communities, the public workers (e.g. fatality, GBV/SEAH, forced or child labor) or the environment, or presents significant reputational risks to the project and World Bank. These incidents will be reported promptly to the PIU and relevant stakeholders and to the World Bank within 48 hours of the project learning of the incident.

Incident reporting concerning Occupational Health and Safety (OHS) will have the following suggested minimum level of content.

Section	Description
I. Who, Where, When	Who: Injured party, witnesses Where: Location of Incident When: Date, time, and shift
II. Description of the Incident – What Happened	- Description of the task that was being performed - Description of the instruments, tools and machines - Description of the location - Weather conditions - What happened prior to the incident? - What happened during the incident? - What happened after the incident?
III. Findings	- Direct Cause -The act that directly caused the incident (e.g. the grinding wheel on the bench grinder exploded) - Indirect Cause -The root cause of the incident (e.g. improper training on using a bench grinder)
IV. Corrective Actions and Improvements	Corrective actions: How the hazardous conditions that directly caused the incident will be eliminated and the target date these actions will be completed System Improvements: Improvements to procedures and policies that indirectly caused the incident and the target date for these improvements to be implemented
V. Conclusion	Lessons learned and areas for improvement
VI. Annex	- Printouts of all the photographs taken - Sketch of the scene - Witness statements - Investigation notes

Key elements of an incident Report

11.10 Annex X: Photographic Evidence of Stakeholder Engagement