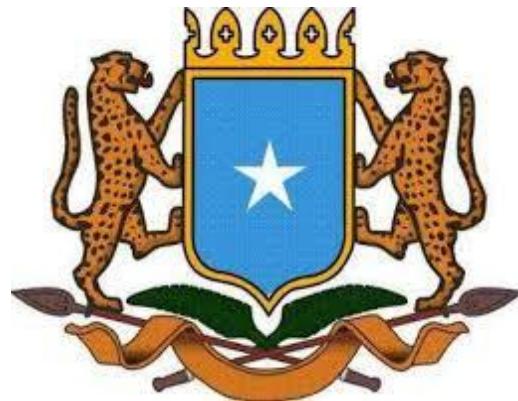


FEDERAL GOVERNMENT OF SOMALIA



Ministry of Finance (MoF)

Somalia Crisis Recovery Project (SCRP)

Environmental and Social Management Framework (ESMF)

25. July 2020

Amended on 9. February 2021

Amended on 22 October 2021 to include Additional Financing

Content

CONTENT	2
ABBREVIATIONS AND ACRONYMS.....	8
EXECUTIVE SUMMARY	11
Project Description	12
Project Components.....	12
Beneficiaries	14
Project Management Structure.....	14
Purpose of the ESMF	15
Environmental and Social Baseline	16
Environmental Baseline.....	16
Socio-Economic Baseline	18
Environmental and Social Risks and Mitigation Measures	23
Institutional and Implementation Arrangements.....	59
Social and Environmental Risk Classification.....	61
Screening Process and Requirements for Sub-Projects	61
Monitoring Plan and Institutional Arrangements.....	62
1. INTRODUCTION	64
1.1. Project Development Objective.....	65
1.2. Project Components.....	65
1.3. Project Context and Target Population.....	67
1.4. Environmental and Social Management Framework.....	68
1.5. Project Management Structure	69
Table 1: Matrix of Responsibilities, including safeguards	72
2. POLICY AND LEGAL FRAMEWORK	74
2.1. National Regulatory and Policy Framework.....	74

2.2. International Conventions Signed and Ratified by Somalia	78
2.3. World Bank Environmental and Social Standards (ESS)	80
2.4. Legal Gap Analysis.....	85
3. ENVIRONMENTAL AND SOCIO-ECONOMIC BASELINE	98
3.1. Environmental Baseline.....	98
3.1.1. Geography and Climate	98
3.1.2. Climate Change	100
3.1.3. Disaster Vulnerability (flood, locusts)	102
3.1.4. Biological Environment	104
3.1.5. Water Resources (Hydrology)	106
3.1.6. Fisheries Resources	109
3.1.7. Covid-19	110
3.2. Socio-Economic Baseline	111
3.2.1. Economic Outlook and Macro-economic Performance.....	111
3.2.2. Human Development.....	112
3.2.3. Governance Structures	113
3.2.4. Agriculture	114
3.2.5. Labor and Employment.....	116
3.2.6. Land Issues.....	117
3.2.7. Cultural Heritage.....	118
3.2.8. Security and Conflict Environment	118
3.2.9. Vulnerability and Social Exclusion.....	120
3.2.10. Youth as a Vulnerable Group	124
4. ENVIRONMENTAL AND SOCIAL RISK CLASSIFICATION.....	126
5. POTENTIAL RISKS AND MITIGATION MEASURES / ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN	128
6. INSTITUTIONAL AND IMPLEMENTATION ARRANGEMENTS.....	163
7. ENVIRONMENTAL AND SOCIAL SCREENING PROCESS.....	167
7.1. Identification of Sub-Project or Site-Specific Activity.....	167
7.2. E&S Screening Process and Preliminary Analysis	167
7.3. World Bank Approval of ESAs and ESMPs.....	169
7.4. ESMF/ESIA/ESMP Disclosure	169
7.5. Implementation of ESMP/ESIA	169

8. MONITORING PLAN	170
8.1. Regular Monitoring and Inspection for Compliance	170
8.2. Incident and Accident Reporting	171
8.3. ESMP/Monitoring Table	173
8.4. E&S Reporting	214
9. GRIEVANCE REDRESS MECHANISMS.....	215
9.1. Assess and Clarify.....	215
9.2. Intake, Acknowledge and Follow-Up	216
9.3. Verify, Investigate and Act	217
9.4. Monitor, Evaluate and Feedback.....	217
9.5. SCRP Grievance Redress Mechanisms Flowchart.....	218
9.6. Monitoring and Reporting of GRM	219
9.7. GBV, Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)	219
9.8. WB's Grievance Redress Service (GRS)	220
10. CAPACITY DEVELOPMENT AND TRAINING SCHEDULE	221
11. RESOURCES AND BUDGET.....	223
12. REFERENCES	224
ANNEX 1: ENVIRONMENTAL AND SOCIAL RISK CATEGORIES AND SCREENING TEMPLATE	229
Risk Categories	229
E&S Screening Template	231
Negative Project List:	238
ANNEX 2: CULTURAL AND CHANCE FIND PROCEDURES	239
ANNEX 3: VOLUNTARY LAND DONATION GUIDELINES AND CONSENT FORM	240

ANNEX 4: GBV/SEA/SH AND CHILD PROTECTION PREVENTION AND RESPONSE ACTION PLAN....	244
Contextual GBV Risks.....	244
Classification of GBV/SEA	247
Potential Project-related SEA/SH Risks	247
Key Mitigation Measures to Address GB/SEA/SH Risks.....	249
Key components of the GBV/SEAH and Child Protection Action Plan.....	250
Monitoring and Supervision Action Plan	257
Available GBV service providers in project areas:	258
GBV/SEA/SH Reporting Format	261
GBV/SEAH Matrix	262
Sample Terms of Reference - GBV technical expert within the Project Implementation Unit (PIU).....	268
ANNEX 5: PROCEDURES FOR MANAGING CONTRACTORS.....	279
Understanding Implementation Responsibilities	279
Contractor Oversight	279
E&S Performance Meetings	280
Review and Approval of Contractor Site-Specific E&S plans.....	280
Kickoff Meeting	280
E&S Induction and Training.....	281
PIU Monitoring of Activities.....	281
Contractor Monitoring and Reporting.....	281
E&S Review of Contractor Invoices	284
ANNEX 6: LABOR MANAGEMENT PROCEDURES.....	285
Labor Forecast	285
Legal Framework	286
National Legal Framework	286
International Conventions Signed and Ratified by Somalia	287
World Bank Environmental and Social Standards (ESS)	288

Labor Risk Assessment.....	292
Institutional Arrangement for Implementation of LMP.....	296
Key Procedures	297
Key Procedures Rationale	298
Recruitment and Replacement Procedure.....	298
Workers' Grievance Redress Procedure.....	299
Occupational Health and Safety Procedures.....	299
Contractor Management Procedures	300
Labor Influx Procedure	301
Procedure for Primary Suppliers	302
Procedure for Community Workers	302
Procedure for Non-Discrimination and Equal Opportunity.....	303
ANNEX 7: GENERAL QUARTERLY AND ANNUAL E&S REPORTING FORMAT	305
ANNEX 8: WORLD BANK INCIDENT CLASSIFICATION GUIDE	310
ANNEX 9: INCIDENT REPORTING GUIDANCE	311
ANNEX 10 : TERMS OF REFERENCE FOR ESIA, OUTLINE OF DETAILED ESMP AND SAMPLE OF ESMP CHECKLIST.....	314
Terms of Reference for ESIA	314
Outline for Detailed ESMP	319
Sample ESMP Checklist	321
ANNEX 11: MUNICIPAL AND SOLID WASTE MANAGEMENT PLAN.....	333
Management of Municipal and Solid Waste	333
Management Measures	334
Transportation and Disposal	335
Monitoring and Reporting	335
Training	335
Review and Update	336
Designated Site for Final Disposal of Municipal and Solid Waste	339
ANNEX 14: INFECTIOUS DISEASE AND WASTE MANAGEMENT PLAN TEMPLATE.....	340

ANNEX 15: MANAGING COVID-19 RISKS ON CONSTRUCTION SITES.....	347
General.....	347
Travel to Sites	347
Site Access Points	348
Communication and Awareness	348
Canteens and Eating Arrangements	348
Changing Facilities, Showers and Drying Rooms	349
Avoiding Close Working.....	349
Site Meetings.....	349
Cleaning.....	350
Procedure in case of contagion	350
Field Offices < 6 People and Field Monitoring	350
Short monitoring/handover missions (for multiple sites)	351
Template for Conditions of Contract.....	352
ANNEX 16: SAMPLE CODE OF CONDUCT.....	353
ANNEX 17: SAMPLE OCCUPATIONAL HEALTH & SAFETY PLAN	357
ANNEX 18: STAKEHOLDER CONSULTATIONS UNDERTAKEN	363
BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES.....	363
Results of key institutional stakeholder consultations	363
Results of community consultations	364
ANNEX 19: STAKEHOLDERS CONSULTED.....	368
ANNEX 20: GRIEVANCE REDRESS MECHANISM (GRM) COMPLIANCE / EXISTING GRM OF IMPLEMENTING PARTNERS (IPS).....	371
ANNEX 21: IP CAPACITY ASSESSMENT FORM	374

Abbreviations and Acronyms

AMISOM	African Union Mission in Somalia
BRA	Benadir Regional Administration
CBO	Community-Based Organization
CEDAW	Convention on the Elimination of All forms of Discrimination against Women
CERC	Contingency Emergency Response Component
CESMP	Contractor-ESMP
CFC	Chlorofluorocarbon
CITES	Convention on International Trade Against Endangered Species
CoC	Code of Conduct
CRW	Crisis Response Window
CRW ERA	Crisis Response Window Early Response Allocation
CSO	Civil Society Organization
DEWC	District Environment and Environment Watch Council
E&S	Environmental & Social
EIA	Environmental Impact Assessments
ENSO	El Niño–Southern Oscillation
ESA	Environmental and Social Assessment
ESF	Environmental and Social Framework
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
ESSAF	Environmental and Social Screening Assessment Framework
FAO	Food and Agricultural Organization
FGM	Female Genital Mutilation
FGS	Federal Government of Somalia
FINA	Floods Impact Needs Assessment
FMS	Federal Member State
FNA	Fisheries Needs Assessment
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GHG	Greenhouse Gases
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanisms
GBVIMS - SGBV	Gender-Based Violence Information Management System

GAM	Global Acute Malnutrition
HDI	Human Development Index
HIPIC	Heavily Indebted Poor Country Initiative
HSSE	Health, Safety, Social & Environmental
HQ	Headquarters
IAIG	Internal Audit & Investigations Group
IDA	International Development Association
IDP	Internally Displaced Person
INGO	International Non-Governmental Organization
ILO	International Labor Organization
ICR	Implementation Completion Report
IFC	International Financial Corporation
INDC	Intended Nationally Determined Contribution
IP	Implementing Partner
IPF	Investment Project Financing
IPV	Intimate Partner Violence
IUCN	International Union for Conservation of Nature
IVA	Independent Verification Agent
LG	Ethics Office, Legal Group
LMP	Labor Management Procedures
MDA	Ministries, Departments, and Agencies
MDRI	Multilateral Debt Relief Initiative
M&E	Monitoring and Evaluation
MEA	Multilateral Environment Agreements
MIS	Management Information System
MNR	Ministry for Natural Resources
MoA	Ministry of Agriculture and Irrigation
MoERD	Min. for Environment and Rural Development
MoEWT	Ministry for Environment, Wildlife and Tourism
MoHADM	Ministry of Humanitarian Affairs and Disaster Management
MoPIED	Ministry of Planning, Investment and Economic Development
MoEWR	Ministry of Energy and Water Resources
NEOC	National Emergency Operations Center
NEWR	Environmental Watch Councils
OHP	Occupational Health and Safety Plan
OHS	Occupational Health and Safety Standards
OPM	Office of the Prime Minister
PAPs	Project Affected Populations
PCG -	People & Change Group
PDO	Project Development Objective
PIU	Project Implementation Unit
PSC	Project Steering Committee
PMP	Pest Management Plan
POM	Project Operations Manual

PPE	Personal Protective Equipment
PPP	Public-Private Partnership
PRMN	Protection Return Monitoring Network
PSEA	Prevention of Sexual Exploitation and Abuse
RAP	Resettlement Action Plan
REWC	Regional Watch Councils
RPF	Resettlement Policy Framework
RRF	National Drought Recovery and Resilience Framework
ROW	Right of Way
SAF	Somali Aid Foundation
SCRP	Somalia Crisis Recovery Project
SDF	Somalia Development Fund
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Security Management Plan
SPT	State Project Team
SWALIM	Somalia Water and Land Information Management
SWP	safe working procedures
SWS	South West State
TDS	Total Dissolved Solids
TOR	Terms of Reference
TRA	Task Specific Risk Assessment
UN	United Nations
UNDP	United Nations Development Programme
UNEP	United Nations Environmental Programme
UNFCCC	UN Framework Convention on Climate Change
UNICEF	United Nations' Children Fund
UNFPA	United Nations Population Fund
UNOPS	United Nations Office for Project Services
USD	United States Dollar
WASH	Water, Sanitation and Hygiene
WB	The World Bank
WCPU	Woman and Child Protection Unit
WHO	World Health Organization
WMP	Waste Management Plan

Executive Summary

This ESMF was originally prepared for the Somalia Crisis Recovery Project (SCRIP), the parent project in May 2020. Additional Financing (AF) was approved in June 2021. As a provision in the AF ESCP, the ESMF was to be updated within three months of Project Effectiveness and prior to disbursement for activities under the AF. The ESMF should cover both parent project and AF financed activities. Along with the ESMF update, other E&S management instruments and tools including the Stakeholder Engagement Plan, Security Management Plan (SMP) and Resettlement Policy Framework (RPF) have also updated three months after Project Effectiveness..

The humanitarian situation in Somalia is deteriorating due to the multiple and simultaneous crises afflicting the country, including drought, floods, conflict, gender inequality, the socio-economic impacts of COVID-19, and locust infestations, all within the same time. Inadequate water and sanitation, poor hygiene practices and chronic food insecurity are among the factors contributing to health and nutrition challenges. Furthermore, systemic problems such as limited investments, infrastructure and regulatory frameworks, as well as climate variability, limit the potential of Somalia's food systems to ensure access to and consumption of nutritious food.

Presently, 5.2 million Somalis need humanitarian assistance, while 1.3 million face severe hunger. Considered as one of the countries' most vulnerable to climate change in the world, the intensity and frequency of climatic events facing Somalia is expected to increase in the coming years. Combined with other development challenges, which include capacity constraints due to more than two decades of conflict, these crises are undermining the country's political and economic gains.

Somalia is continuing to rebuild economic governance institutions amid challenging circumstances. Continuous reform implementation enabled Somalia to reach the first milestone in obtaining debt relief and fully reengage with the international community in March 2020.

Agriculture is an important economic activity in Somalia not only in terms of meeting the food needs of the population (roughly 50% of population's cereal requirements are met through domestic production), but also in terms of generating income through crop sales and agricultural labor opportunities. However, two decades of conflict have created a situation of protracted and complex emergency, which has eroded livelihoods and led to increased vulnerability to food insecurity. In the midst of one of the worst humanitarian crises, hunger and malnutrition are some of the major causes of suffering for significant sections of the population. Due to intermittent conflict, floods, drought, disease outbreaks and very limited access to basic services and humanitarian space, a section of Somali families increasingly face challenges to maintain a food secure and well-nourished household¹.

An example is the country's 3,330 km of coastline, the longest in Africa which remains one of the country's most untapped resource. The country's per capita fish consumption is 2.4 kg/year². This is low compared to global per capita of 19 kg/year³. Domestic fish consumption is limited to main towns and coastal villages

¹ <http://www.fao.org/3/as787e/as787e.pdf>

² Food & Agriculture Organisation, 2005

³ Improving Development and Management of Somalia's Marine Fisheries

due to poor infrastructure limiting fish delivery to markets, seasonality of supply, and meat-eating tradition among the population.

In the agro pastoral sector, affected by various climate parameters such as drought, floods, conflicts, etc, some of the solutions shall be to increase crop production and productivity and improving returns to farmers' investment of labor and inputs. This may be achieved through the provision of easy access to inputs and agricultural services, improving farmer production and business skills, soil and water management and upgrade on-farm water management and infrastructure, among others.

Project Description

The FGS appealed for emergency assistance and investment in longer-term solutions to avert future crisis in October 2019, with the government-led response directed by a high-level inter-ministerial Flood Response Committee. This was followed by a request by the FGS to the World Bank to support a government-led Post Disaster Needs Assessment and Floods Recovery and Resilience Framework for the flood-affected areas in early December 2019, followed by a further request in January 2020 to the World Bank for funding from the International Development Association (IDA) Crisis Response Window (CRW) to support flood recovery and resilience-building. With the country's arrears recently cleared in March 2020 in the context of the Heavily Indebted Poor Country Initiative (HIPIC), Somalia is now eligible for international financing in line with the World Bank's re-engagement strategy for the country.

In May 2021 the FGS requested for Additional Financing (AF) to implement a 6th Component on 'Anticipator and Recovery Support for Addressing Food Insecurity'. This will entail: (a) immediate livelihoods support through an 'Inputs for Assets' approach under which water supply, agricultural and fishing inputs will be provided to communities either unconditionally or in return for their participation in water and fisheries infrastructure, and; (b) strengthening and rehabilitation of existing small to medium scale water and fisheries infrastructure using regular (community) contracting mechanisms while maximizing the use of labor intensive methods. The project will ensure clarity of ownership and management arrangements of all community and local administrations' assets to be rehabilitated under the Project, to ensure their adequate future operations and maintenance. In addition, given that the food insecurity crisis is spread across the entire country, the scope of the AF will be national, including Somaliland, however appropriate implementation arrangements between the FGS and Somaliland will be discussed prior to implementation of the AF activities.

Project Components

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

Component 1 (US\$ 30 million equivalent): Immediate basic services and livelihood support for early recovery to the flood affected states of Hirshabelle, South West, and Jubaland and locust-affected areas nationally through: (a) establishing a cash-for-work scheme for vulnerable households in Flood and/or Drought Affected Areas; (b) controlling the desert locust population through ground and aerial spraying operations and carrying related impact assessment and surveillance activities; (c) restoring and protecting farmers' capacity for agricultural production through the provision of inputs, the pro-positioning of feedstock, the control of vectors and vector-borne livestock disease; (d) revitalizing basic health provisions strengthening response services and referral pathways for survivors of GBV; and (e) supporting household hygiene promotion and treatment.

Component 2 (US\$ 42 million equivalent): Medium-term flood recovery to rehabilitate of critical public and community infrastructure⁴ in line with build-back-better and climate resilient standards. The component will rehabilitate water and sanitation systems, broken or non-functioning pre-existing flood control systems (e.g., embankments, drainage, irrigation canals and restoration of river channels through dredging), health facilities, bridges, and small feeder roads. It will also support local mitigation efforts for risk reduction such as slope protection and environmental rehabilitation.

Component 3 (US\$ 39 million equivalent): Longer-term disaster risk management and preparedness. This component will strengthen the institutional capacity and preparedness of governmental ministries agencies and departments to respond to flood and draught related emergencies through, *inter alia*: (a) piloting integrated flood-drought preparedness and response solutions including community level structural and non-structural interventions; (b) carrying out flood risk management strengthening enabling policy and institutional framework, flood risk assessment and hazard mapping, and pilot for structural flood risk reduction interventions; (c) supporting hydromet and early warning systems for the generation and dissemination of hydromet data; (d) operationalizing the National Drought Recovery and Resilience Framework Secretariat in MoPIED, institutionalizing investment planning processes, aid tracking, inter-institutional coordination and programmatic monitoring and evaluation; (e) establishing the National Emergency Operations Center and developing and rolling out public-civil society collaboration models for crisis response and preparedness; (f) establishing a locusts early warning system; (g) strengthening the Integrated Disease Surveillance and Response System and enhancing laboratory capacity for the timely detection of pathogens (including for COVID-19); and (h) rehabilitating, developing, and equipping selected health facilities for the delivery of essential health services.

Component 4 (US\$ 6 million equivalent): Project Management. This component will strengthen the institutional capacity Project Implementation Unit (PIU) and State Project Teams for the implementation of the Project, including procurement and financial management activities and audits, preparation of subproject designs and construction supervision, implementation of environmental and social monitoring actions and mitigation measures therefor, quality assurance responsibilities, technical management and oversight, grievance redressal system (including protection from GBV/SEAH and incidents referrals), Project monitoring and evaluation (including independent verification agents [IVA]), and reporting requirements.

Component 5 (US\$ 20.5 million equivalent): Contingency Emergency Response Component. This Contingency Emergency Response Component (CERC) is included in the Project in accordance with Investment Project Financing (IPF) Policy, paragraphs 12 and 13. There is a moderate to high probability that during the life of the Project Somalia will experience natural or man-made disasters, and major disease outbreaks of public health importance which causes a major adverse economic and/or social impact, which will result in a request to the Bank to support mitigation, response, and recovery in the areas affected by such an emergency. In the event of such an emergency, the CERC will serve as a first-line financing option for response. Additionally, the CERC is flexible enough to incorporate the new Crisis Response Window Early Response Allocation (CRW ERA) criteria so that it can be mobilized as part of an early response to an eligible food security crisis or disease outbreak.

⁴Community infrastructure could include: (a) small-scale community self-built and self-maintained infrastructure; (b) community infrastructure developed, financed, maintained, and operated through non-public means such as NGOs, bilateral funding programs, etc.; and (c) small-scale community infrastructure that may have been created through public financing but was handed over to or fell into community hands for maintenance and upkeep.

Component 6: Anticipatory and Recovery Support for Addressing Food Insecurity: This component will include the following two subcomponents:

- Subcomponent 6a: Anticipatory Action and Early Response Support to Food Insecure Communities (US\$ 22.5 million). This will include: (a) Immediate Rehabilitation of Small-Scale Community Irrigation and Water Supply Infrastructure, and; (b) Immediate Provision of Fishing Inputs and Infrastructure to Coastal Communities, and related training and awareness. These activities will be undertaken using the 'Inputs for Assets' approach under which agricultural and fishing inputs will be provided to communities in return for their participation in water and fisheries infrastructure. This component will also retain the option of providing agricultural and fishing inputs unconditionally to more vulnerable groups or if otherwise warranted by local circumstances.
- Subcomponent 6b: Medium-term Sustainable Recovery and Resilience of Food Insecure Communities (US\$ 22.5 million equivalent). This will include the rehabilitation and reconstruction of : (a) Larger Drought-Mitigating Water and Irrigation Infrastructure⁵ ; (b) Fishing Coastal Community Infrastructure and Value Chain Resilience, and; (c) capacity building, training and awareness building of government and communities for recovery planning, scheme design, operation and maintenance and technical oversight for the planned water and fishery infrastructure works, and operation and maintenance under clear ownership and management arrangements. This component will employ routine design and contracting methods while maximizing the use of labor-intensive methods, where applicable.

Beneficiaries

The Project will support people affected by the impacts of floods and drought, as well by locust infestations. This includes around 300,000 households, including a focus on female-headed households, and over 150,000 livestock, as well as rehabilitated assets for over 40 communities. On a ratio of five individuals per household, this amounts to over 1.6 million persons. The most vulnerable populations, farming communities, IDPs, and host communities will be supported through multiple interventions.

However, targets for some selected PDO indicators under the original SCRP Results Framework (RF) are proposed to be revised to reflect the expanded scope of activities and beneficiaries introduced under the Additional Financing. Additional indicators are proposed to be incorporated in the SCRP AF results framework to reflect the AF operations being added to the SCRP. The number of direct overall beneficiaries from the project as a result of the AF would be close to 2 million people, with a few more millions of indirect beneficiaries.

Project Management Structure

The Project builds on existing institutional structures to enhance coordination between Government agencies and state and federal levels and flood-affected communities, with an overarching objective to restore the legitimacy of the State and strengthen State-Citizen trust.

Project Steering Committee (PSC). The Project will be overseen by a Project Steering Committee chaired by senior staff from the Office of the Prime Minister (OPM), comprised of Director Generals of the Ministry

⁵ This would include existing infrastructure damaged by conflict, natural disasters or infrastructure that may have fallen into disrepair due to neglect and deferred maintenance.

of Finance (MOF), Ministry of Planning and Economic Development (MoPIED), and FMS MoPIED. The PSC will serve as an apex decision-making body responsible for broader strategic oversight, policy guidance, validation of broader resource allocation recommendations by the PIU, and other key decisions referred to it over time. The PSC will also approve state investment and procurement plans, conduct periodic implementation progress and compliance reviews, perform trouble shooting functions particularly in the event of disputes, liaise with high level law enforcement agencies to ensure project security, validate strategic course corrections recommended by the PIU and other project constituents, and validate PIU state performance assessments and performance-based allocations to states.

Project Implementation Unit. The Project PIU will be mapped to the MoF and co-managed and co-staffed by a combination of MoF and MoPIED personnel. It will be responsible for project management, coordination and implementation support to the FMS. These tasks will include quality and process oversight, financial management, procurement, reporting and certification, contract management, M&E, and on ensuring social and environmental safeguards compliance. MoPIED will lead the PIU functions on coordination between Federal and State Government to facilitate prioritization, sequencing, and investment planning and to ensure that different sectoral line agencies work together to implement the multi-sectoral project activities.

At the State level

FMS MDA. All implementation of medium-term recovery interventions will be delegated to the relevant FMS institutions. FMS MDAs will identify sub-project interventions under the investment plans and prepare subproject designs and bidding documents in consultation with FGS MDAs, as well as support the procurement of contractors. FMS MDAs will also be responsible for contractor and site supervision, technical quality assurance, certification, and payment of works. The Project will finance the operating costs of the respective project teams in these MDAs to ensure that existing capacity and organizational structures are used and enhanced where necessary.

State Project Teams. A State-level extension of the PIU, the SPT⁶ is proposed as a “light” structure in each Project state, to be housed in FMS MoPIED, serving primarily as a ‘node of convergence’ at the state level. They are responsible for design review and compliance of proposed designs and supervision of works, consolidating FMS MDA procurement and work plans, and supporting the PIU to manage the FMS Grievance Redress Mechanism (GRM) and project M&E. The SPT will be led by FMS Project “focal points” that will coordinate the participation of relevant technical FMS MDAs. The SPT will review the final procurement plans to assure compliance with World Bank standards, including safeguards, GRM, building-back-better, etc., and consolidation, with onward transmission to the federal PIU for final approval by the PSC. Importantly, the SPT will be responsible for district-level community consultations and raising awareness of the project in their communities through strategic communication, and for monitoring and supervising construction works in view of their compliance with the ESF and national laws.

Purpose of the ESMF

The main purpose of this ESMF is to establish procedures and methodologies for environmental and social assessments, review, approval and implementation of investments to be financed under Components 1-4 and component 6 of the Project, as the nature, scope and locations of activities become known during the implementation of the Project. A separate COVID-19/CERC ESMF has been prepared to cover activities conducted under Component 5 activities (CERC). Furthermore, a Pest Management Plan (PMP) has been

⁶ May include E&S safeguards, procurement, and engineering expertise.

prepared for Component 1 activities. It is a standalone document and has been prepared, approved and disseminated.

The ESMF describes the appropriate roles and responsibilities of the PIU and all Implementing Partners (IPs) and other stakeholders, and outlines the reporting procedures on environmental and social (E&S) issues. It describes the managing and monitoring processes of E&S concerns related to the project investments. The ESMF further serves to highlight potential environmental and social risks and impacts and propose ways to avoid, minimize and offset these risks and impacts as well set out ways to increase environmental and social outcomes of the project; and to establish processes, procedures and methodologies for the environmental and social screening of project activities. It further determines the training, capacity building and technical assistance required for the PIU and all IPs to successfully implement the provisions of the ESMF and associated instruments; and establishes the Project's staffing and institutional arrangements clarifying the relations between the PIU, IPs and the World Bank, including roles and responsibilities in view of the implementation of this ESMF.

The implementation of the Project and of this ESMF may produce lessons that lead to required changes to the ESMF. Once this ESMF has been approved by the World Bank and has been disclosed, any required changes need to be submitted by the PIU to the PSC for approval, and to the World Bank for approval in order to become effective.

Environmental and Social Baseline

Environmental Baseline

Geography: Somalia is Africa's easternmost country, and is bordered by Kenya to the south, Ethiopia to the west, Djibouti to the north-west, the Gulf of Aden to the north, and the Indian Ocean to the east. It has a land area of 637,540 km², and a coastline of 3,300 km, the longest of any African country, 1,300 km of which is on the Gulf of Aden and the other 2,000 km on the Indian Ocean. The country stretches for almost 1,550 km from north to south between latitudes 12°00'N and 1°37'S, and 1,095 km from west to east between longitudes 41°00' and 51°21'E⁷.

Climate: Somalia is a large, relatively flat country, with an arid or semi-arid climate and prone to severe droughts and floods. It's twelve million or so 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.

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, 50-150mm 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

⁷ UNEP, State of Environment in Somalia, 2005.

climate in the Horn of Africa is affected by the Indian Ocean's variable sea-surface temperatures and the El Niño–Southern Oscillation (ENSO) cycle⁸. Different ENSO phases have diverse impacts during seasons and across different parts of the Horn⁹.

Climate Change: 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 storms¹⁰. 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 stakeholders¹¹.

Somalia has had a fair share of extreme weather events for the past 25 years¹². The three states under discussion are heavily affected, with this type of weather, threatening food security in the respective areas.

Disaster Vulnerability: Somalia has been ranked as one of the most vulnerable countries and least prepared to deal with the effects of climate change. Rainfall totals during the first half of the April to June *Gu* season are some of the highest on the 1981–2017 record, equivalent to between 130 and over 200 percent of average (Figure 8). The heavy rainfall marks the end of prolonged drought across much of the country and is supporting crop development and the regeneration of pasture and water resources. However, the heavy rainfall and subsequent flooding has also led to fatalities, massive displacement, and damage to infrastructure and cropland. Needs are expected to increase in displacement sites and riverine areas in the near term.

Desert Locust are always present somewhere in the deserts between Mauritania and India. If good rains fall and green vegetation develop, Desert Locust can rapidly increase in number and within a month or two, start to concentrate, gregarize which, unless checked, can lead to the formation of small groups or bands of wingless hoppers and small groups or swarms winged adults causing an outbreak. If an outbreak or contemporaneous outbreaks are not controlled and if widespread or unusually heavy rains fall in adjacent areas, several successive seasons of breeding can occur that causes further hopper band and adult swarm formation, causing an UPSURGE and generally affects an entire region.

⁸Williams, A. P. and Funk, C., 'A westward extension of the warm pool leads to a westward extension of the Walker circulation, drying eastern Africa', *Climate Dynamics*, vol. 37, no. 11–12, Dec. 2011, pp. 2417–35.

⁹Anyah, R. O. and Semazzi, F. H. M., 'Climate variability over the Greater Horn of Africa based on NCAR AGCM ensemble', *Theoretical and Applied Climatology*, vol. 86, no. 1–4, Sep. 2006, pp. 39–62.

¹⁰Ministry of National Resources, *National Adaptation Programme of Action on Climate Change (NAPA)* (Federal Republic of Somalia: Mogadishu), Apr. 2013, p. 14.

¹¹Somalia Country Economic Memorandum; *Rebuilding Resilient and Sustainable Agriculture in Somalia*, 2018

¹²Food and Agriculture Organization of the United Nations (FAO), 'Somalia floods update', 7 May 2018.

If an upsurge is not controlled and ecological conditions remain favorable for breeding, locust populations continue to increase in number and size, and the majority of the infestations occur as bands and swarms, then a PLAGUE can develop. A major plague exists when two or more regions are affected simultaneously¹³.

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 important to address, although *Prosopis* could be used to substitute endemic trees for charcoal production^{Error! Bookmark not defined.}

Surface Water Bodies: 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 1)¹⁴. 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 1 and 2). Increased dam-building activities in Ethiopia affect the river system further¹⁵.

Fisheries Resources: Somalia has the longest coastline in Africa, measuring 3,330 km and claims an EEZ of some 830,389 km². Its fishery resources are significant, with an estimated sustainable potential in the order of 200,000 MT per year for pelagic fish stocks, based on several fish surveys conducted in the 1970s and 1980s as reported in the FAO Fishery Country Profile for 2005. Somalia's marine fishery dominates the fishery sector. There is no history of aquaculture but there is a small inland fishery sector mostly based on riverine systems.¹⁶

Socio-Economic Baseline

Economic Outlook: Somalia's economy is largely consumption-based and dominated by agriculture, while it is also supported by remittances and large aid flows. Remittances and aid flows are estimated at USD 1.4 billion a year, which represents 29 per cent of Somalia's GDP in 2018. Agriculture plays a key role by constituting 75 per cent of GDP, and 93 per cent of total exports. Other sectors driving growth are construction, telecommunications and money transfer services.¹⁷

¹³ Food and Agriculture Organization of the United Nations (FAO), Locust Watch: Desert Locust Outbreaks, accessed at: <http://www.fao.org/ag/locusts/en/archives/1032/index.html>

¹⁴UN Environment Programme (UNEP), *Africa Water Atlas*, Nairobi, 2010.

¹⁵Somalia Water and Land Information Management (SWALIM) and Food and Agriculture Organization of the United Nations (FAO), 'The Juba and Shabelle rivers and their importance to Somalia', 2016.

¹⁶ Fisheries in the ESA-IO Region: Profile and Trends (Somalia), 2014

¹⁷ Government of the Federal Republic of Somalia and The World Bank, Somalia. 2019 Flood Impact and Needs Assessment, February 2020, p. 18.

Continued conflict and frequent natural disaster have contributed to significant poverty in Somalia. About 69 per cent of Somalis live below the poverty line. Poverty is thereby most acute among children, youth, and IDPs, as well as persons living in rural areas.¹⁸

Somalia scores very low on UNDP's Human Development Index. Although it has not been ranked for a few years, different indicators reveal low scores. For example, life expectancy at birth lies at 57.1 years with a global average of 56 years¹⁹ in low human development countries²⁰; and the mortality rate under the age of 5 lies at 127 per 1000 life births²¹, while the global average is 39²².

WASH: Access to safe water is low in Somalia, access to basic water supply lies at 83 per cent in the urban areas and 28 per cent in rural areas. 61 per cent of the population has access to basic sanitation facilities in urban areas and 20 per cent in rural areas. According to a UNICEF report, the key challenges are weak water supply management models, high operational management costs and technical limitations. There is further a lack of a harmonized legal and policy framework and policies in place and inconsistent with implementation.²³

Continued droughts have had negative impact on the water sector, and conflicts have weakened the water supply and sanitation services. WASH facilities have been destroyed as a result of conflict, and there is a lack of sufficient WASH facilities for the large number of IDPs. Furthermore, the population pressure causes over pumping of ground water, and the wearing out of equipment.²⁴

Livelihood: Livelihoods in Somalia are dominated primarily by livestock, as well as by crop production, both of which are important for subsistence and cash income. The drought is therefore a significant shock for large portions of the population.

Agriculture – Irrigation and Rain-Fed Crop Production: The agriculture sector is Somalia's second largest source of economic activity, employment, and exports, with agro pastoralists estimated at about 23 percent of the total population. Smallholder farming accounts for 80 percent of total crop output and 70 percent of marketed agricultural produce. 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.

Agriculture - Livestock: The livestock sector is central to the economic and cultural life of the Somali people. The sector provides food and income to over 60 percent of the country's population.²⁵

¹⁸ Government of the Federal Republic of Somalia and The World Bank, Somalia 2020,, p. 18.

¹⁹ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

²⁰ UNDP, Human Development Report 2019, p.38.

²¹ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

²² WHO, Children. Reducing Mortality, factsheet, accessed at: <https://www.who.int/news-room/fact-sheets/detail/children-reducing-mortality>

²³ UNICEF Somalia Country Office, Water, Sanitation & Hygiene (WASH) Profile, February 2020, p.2, accessed at: <https://www.unicef.org/somalia/media/1251/file/Somalia-wash-profile-February-2020.pdf>

²⁴ Ditto, p. 2

²⁵ IGAD, Somalia. Land Governance Country Profile, Assessment of Land Governance Framework, Training & Research Land Governance Institutions, accessed at: <https://land.igad.int/index.php/countries/39-countries/somalia/40-somalia-profile?showall=1>

Agriculture – Fisheries: Marine fishery dominates the fisheries sector. Coastal communities are heavily dependent on fishing, carried out mostly by men. Women dominate fish processing, trading, and support activities, and some women are multiple boat owners, although there are no specific numbers available to quantify the division of labor in the sector between men and women.

Water Supply & Sanitation: Water resources in Somalia are dominated by surface water. During the baseline period of 2013-2015, Somalia Water and Land Information Management (SWALIM) estimates that there were around 3,733 water points, 61 percent (2,261 sources) of which were reported to be perennial, under normal conditions.

Food Security: Food security is a cross-cutting sector that reflects the combined effects of drought on food security related sectors such as agriculture (crop production, access to agricultural employment), livestock (livestock production and reproduction), trade and market prices (food and livestock prices and purchasing power of the population). Following consecutive seasons of poor *Gu* and *Deyr*, food crisis has worsened in rural areas.

Labor and Employment: 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.²⁶ 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.²⁷

Land: Land conflicts in Somalia have risen to be one of the key issues of instability at the inter and intra community level. This is partly due to a complex situation of land tenure. While the Agricultural Land Law of 1975 abolished private ownership, the current situation is very unclear. Only few locals registered their land at the time, and the civil war further impacted the situation negatively. Customary land tenure has therefore taken the center stage in ordering land ownership and usage. It is focused on clan relations and on pastoral land use rather than norms of individual ownership. The Provisional Constitution defines land as public property. The government has created means to transfer some land into private ownership by granting ownership for urban and agricultural land.²⁸ Formal legal frameworks now exist alongside customary land management.

Security and Conflict: Somalia ranks second on the Fragile State Index from 2019 with a total score of 112.3, only topped by Yemen with a score of 113.5.²⁹ Somalia's indicators on factionalized elites, and demographic pressures score the highest.

There is significant conflict at different levels in Somalia. Some insecurity stems from clan competition, which goes back into history and historical movements and power distribution. Often it is combined with localized competition over resources, for example over land or water sources. Such insecurity and conflict can be due to continued local tension between different communities, competition over sources of power,

²⁶ FGS, Ministry of Education, Culture and Higher Education, Education Sector Strategic Plan 2018-2020, p.13

²⁷ 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/>

²⁸ IGAD, Somalia. Land Governance Country Profile, Assessment of Land Governance Framework, Training & Research Land Governance Institutions, accessed at: <https://land.igad.int/index.php/countries/39-countries/somalia/40-somalia-profile?showall=1>

²⁹ Fragile State Index 2019, accessed at: <https://fragilestatesindex.org/data/>

such as governmental positions, as well as competition over aid resources brought down to the state or district level.

The social impacts and potential aggravation of resource-related conflicts is well documented in a range of pastoralist and agro-pastoralist assessments carried out in the Somali region³⁰. Access to water and pasture is a fundamental source of both conflict and co-operation 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 exists³¹. 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.

The Islamist group Al-Shabaab still controls areas in South Central Somalia, providing harsh treatment, forced recruitment vis-à-vis the local populations. It infiltrates other areas and conducts deadly attacks on citizens. Most importantly, Al Shabaab has introduced a harsh tax system in its areas of control and beyond. It has also started to expand on other administrative functions, such as the provision of justice.³² Given the weakness of the formal justice system, people have been flogging to Al Shabaab courts, where swift justice and the execution of judgments is guaranteed. Al Shabaab remains as a key source of violence, attacking government facilities, personnel, security forces, and members of international organizations.

Health: The conflict-related fragility of Somalia over the past two and a half decades has resulted in the weakening of the health sector, its systems and its personnel, with a related focus on emergency response interventions to recurrent crises. Countrywide, there is less than 1 health facility per 10,000 people, and many health posts do not operate fully due to human resource and infrastructure constraints.

Nutrition: Somalia is among the ten countries with the highest prevalence of malnutrition in the world, and the third highest in the eastern and southern Africa region, at 17.42 percent Global Acute Malnutrition (GAM) amongst children under five years (U5), with 3.2 percent being severely malnourished.

Displacement: At the end of 2018, Somalia had 2.6 million IDPs, due to both, disaster and conflict. Conflict and violence had thereby triggered 578,000 new displacements; and disasters 547,000.³³ During the famine in 2017, people dependent on livestock and agriculture had to abandon their rural homes to find new opportunities in urban areas.

Drought conditions are contributing to already pronounced rates of acute and protracted displacement. More than 278,000 people have been displaced in March alone within Somalia due to the drought, bringing the total number to approximately 585,630 since December 2016³⁴.

³⁰ I. M. Lewis, 1961, A Pastoral Democracy; I.M. Lewis, 1998, Understanding Somalia; DfID Somalia: Drivers of Conflict, 2005; N. Gomes, Access to water for pastoral resources management, 2006.

³¹ See, for example, Lewis 1961; DFID 2005, Gomes 2006; *Natural Resources & conflict management- the case of Land*, Economic Commission for Africa Sub-Regional Office for Eastern Africa, SRO-EA, 2012.

³² Security Council, S2019/858, p.3.

³³ Internal Displacement Monitoring Center, The Ripple Effect. Economic Impacts of Internal Displacement. Case Studies in Eswatini, Ethiopia, Kenya and Somalia, Thematic Series, January 2020, p. 30.

³⁴ UNHCR, UN Habitat, IOM, JIRA and Local Ministries of Interior, IOM and The World Bank, 2017

Gender Equality: Insecurity for women is still the number one issue that prevents gender equality and women's empowerment from being a feasible objective. Women continue to suffer disproportionately from clan-fights and extremist interventions. Formal security forces have proven to be weak in their willingness to protect women, and the justice apparatus has failed survivors of conflict-related SGBV³⁵, as well as the many survivors of domestic violence and FGM. Protracted conflict and fragility have increased fundamentalist religious interpretations, including the acceptance of pharaonic-type FGM by a younger generation.³⁶

Lessons Learnt from Parent Project: Whilst Implementing the activities under the AF, lessons learnt from the SCRP Parent Project will be taken into account. These lessons include the facilitation of bottom-up planning and accountability; the facilitation of regular dialogues between the senior leadership of the PIU and UN agencies in order to support compliance with the ESF; and the improved implementation of the GBV Action Plan. While the initial roll-out of the GRM was slow, the GRM have been set up successfully and have been recording feedback across the project areas. Furthermore, while the Security Management Framework and the Security Management Plan for the project have been updated to include the AF, increased focus should be put on their implementation. Additionally, project implementation has shown that increased capacity building on the ESF is required across all categories of staff and implementing partners, including implementing UN agencies.

³⁵ Implementation of the Beijing Platform for Action. Beijing +20 Review. Somalia Country Report 2014, p. 14.

³⁶ See, for example, NAFIS Network/MOLSA, Assessment of the Prevalence, Perception and Attitude of Female

Environmental and Social Risks and Mitigation Measures

Potential Risks and Mitigation Measures

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts				
Risks and impacts under ESS 1 relate to general Project activities, including to beneficiary targeting.				
	Targeting and diversion Project benefits being diverted to ineligible and less-deserving locations and individuals Diversion of sub projects. Sub project can be diverted at point of delivery. Given that monitoring in conflict situations can be difficult, there is a likelihood that project resources and sub projects get diverted at different stages of project implementation.	<ul style="list-style-type: none"> Use of Floods Impact Needs Assessment (FINA) to guide the selection of project sites for priority investments to address site selection and elite capture concerns Continuous monitoring of the project to take account of changing dynamics that have implications for risks for manipulation of project Engagement of high capacity implementation support agencies to support project monitoring Ensure that selection of beneficiary locations, modes of selection and decision making are widely disseminated among the public (SEP) Closely monitor the use of project resources through IVA or other monitors Where physical monitoring is not possible, deploy technological means to monitor the implementation of physical sub projects 	IP IP, SPTs, MDAs IP budget GRM activities partly on IP budgets GRM hotline implemented by PIU: 500.000 USD IVA budget	Monitoring activities and implementation of SEP as part of IP budget GRM activities partly on IP budgets GRM hotline implemented by PIU: 500.000 USD IVA budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>Project investments may not reach the truly vulnerable, marginalized and minority members of the community. This is further exacerbated by the nature of some interventions being rolled out such as cash transfers, weaker formal redress systems and limitations in effective community engagements and participation.</p>	<ul style="list-style-type: none"> Conduct FINA with support from development partners to estimate the extent of damages caused by floods as well as guide priorities for recovery, including selection of locations for investments. Implement robust stakeholder engagements (see SEP) – especially at the community level - to explain the rationale for selection of sites for investments Sensitize communities on the availability of a project grievance redress mechanism (GRM) to support the systematic uptake, processing and resolution of project related complaints and grievances (see SEP) 	IPs, PIU	IP budget, including implementation of SEP, rolling out of GRM
<p>• Fish Project Activities</p> <p>Proposed construction of small-scale fish landing, processing and handling sites and rehabilitation and reconstruction of water infrastructure for food insecure communities, impacts may include;</p> <p>a) challenges with the disposal of the construction wastes and materials,</p> <p>b) Impacts on marine and benthic animals and plants</p>		<ul style="list-style-type: none"> Appropriate mitigation measures for the respective risks and impacts identified for the proposed construction of small scale fish infrastructure are provided under the respective environmental and social safeguards discussed below. The updated frameworks shall be guiding tool to further develop a Site Specific ESMP when the project site is known. Likewise, any new risks and impacts under AF associated with labor, security and Gender Based Violence (GBV) should be reflected in updated LMP, Security Management Plan and GBV Response Plan as required To address insecurity associated with working in rural Somalia, additional stakeholder engagement and community participation should be conducted. 	IP	

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	c) disposal and management of large amounts of excavated material generated from construction activities during the construction phase			
	d) Erosion and sedimentation of rivers from earth works and run-off during the construction phase			
	e) Occupational health and safety of workers both during the construction and operational phases			
	f) increased level of dust, noise and vibration from moving of construction vehicles and machinery, and community health and safety risk and pollution of surface and groundwater sources			
	g) Insecurity associated with working in rural Somalia which may jeopardise the			

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	implementation process of the project.			
	<ul style="list-style-type: none"> Access <p>Access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring will be a challenge, as Project locations are likely to be remote underserved areas with basic physical and community infrastructure devastated by drought and floods.</p>	<ul style="list-style-type: none"> Involve UNOPS, FAO and other humanitarian and development organizations with valuable knowledge and experience in delivering specialized operations in the target locations to provide relative advantage to challenges of access to site Monitoring will also be provided by the same high capacity institutions 	IPs	IP budget
	<ul style="list-style-type: none"> Inward Migration <p>Risk of population influx from neighboring district and locations, which may upset community dynamics and perpetuate clashes and animosity exacerbating social and environmental fragility</p>	<ul style="list-style-type: none"> Select priority areas guided by findings and recommendations from FNA Proper and transparent targeting of vulnerable populations, ensuring inclusion in particular for displaced populations, for cash-based interventions and the small amounts of transfers is seen as a mitigating measure against harmful inward migration 	IPs, SPTs, MDAs	IP budget
	<ul style="list-style-type: none"> Systemic Weaknesses <p>Capacity of the borrower to identify, understand</p>	<ul style="list-style-type: none"> Engage UNOPS, FAO and other humanitarian and development organizations to fill capacity gaps for 	UNOPS, FAO	UNOPS/FAO budgets

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>and preventing adverse social impacts on the project is limited. This includes capacity for monitoring of impact and redressing the impacts of social harm where it has occurred.</p> <ul style="list-style-type: none"> Conflict <p>Conflict and tensions can rise over the selection of locations of new infrastructure</p> <p>Lack of inclusion can lead to grievances over sub project selection and benefits. There is a risk that some groups are not included in decision making fora and that they do not end up benefitting from the sub projects. This can lead to grievances over the decision-making fora, those in decision-making powers and the sub projects.</p> <p>Conflict risks due to deployment of contractors</p>	<p>the application of risk mitigation protocols and monitoring of impacts for social harm.</p> <ul style="list-style-type: none"> Build the capacity of the borrower in the implementation of risk mitigation measures and the monitoring thereof throughout project implementation Conduct contextual analysis and conflict mapping prior to engagement Implement and monitor GRM Implementation of contractor management procedures (see Annex 5) 		
	Technical Assistance and Studies			
	Feasibility studies,	<ul style="list-style-type: none"> Integrate E&S objectives into TA process 	PIU / IP	PIU / IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	technical design, policies, plans and strategies developed or conducted may have significant E&S impacts Studies implemented by IPs are not consistent with the ESSs Capacity Building support to institution that implement or oversee E&S standards and compliance may lack focus on E&S impacts	<ul style="list-style-type: none"> Promote transparency through stakeholder participation and public information disclosure TORs for studies supported by IPs must be consistent with the relevant requirements of the ESSs and subject to prior review by the World Bank. Promote E&S capacity building and institutional strengthening 	PIU/IP	IP budget
			PIU / IP	PIU / IP budget
<ul style="list-style-type: none"> ESS 2: Labor and Working Conditions <p>Nearly all activities will require some type of project workers. Component 1 includes community-based labour, such as for debris removal, replanting of vegetation, collecting of debris materials for reconstruction, and other cash for work activities. Component 2 further includes skilled labour, including through contractors, for the rehabilitation and reconstruction of critical community infrastructure; community-led rehabilitation of communal water and sanitation systems; flood mitigation works; community-led restoration of damaged irrigation schemes; fisheries sub-projects; rehabilitation and re-equipment of damaged primary and secondary schools; rehabilitation and re-equipment of damaged primary and secondary health facilities (for a detailed definition of workers see annex 6).</p>				
ESS 2	Security of all Project workers	<ul style="list-style-type: none"> Implement and monitor Security Management Plan (SMP) 	IPs, PIU	Staff costs, costs of security personnel 1,000,000 USD
	Risks of child and forced labor	<ul style="list-style-type: none"> Ensure that labor for the project will be sourced and managed responsibly including the set-up of a workers' GRM, which includes reporting channels that enable safe and confidential reporting channels and protocols for reporting cases of sexual harassment. 	IP, PIU	Staff costs

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Lack of occupational health and safety (OHS) for workers deployed at construction sites.	<ul style="list-style-type: none"> Provide necessary personal protective equipment (PPE) to all field officers directly involved in IP spraying. 		Construction budget
	Field officers directly involved in spraying operations may be exposed to insecticides and run the risk of being poisoned. Other field staff can also be exposed, either accidentally or during the normal course of their work based on task assigned or a number of tasks	<ul style="list-style-type: none"> Training on use of PPE Implement procedure of dealing with accidents and exposures 		
	Delayed payment of workers or community workers leading to complaints and conflict Underpayment of contracted workers or supply workers	<ul style="list-style-type: none"> Implement and monitor LMP 	IP, PIU	Staff Costs
	Labor and working conditions of community workers don't comply with WB and Somali legislation	<ul style="list-style-type: none"> Implement and monitor the LMP (see annex 6) Develop and implement OHS Plan for workers 	IP, PIU	Staff Costs

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<ul style="list-style-type: none"> – including occupational health and safety risks. <p>Poor working conditions: unsafe work environment</p>	<ul style="list-style-type: none"> Conduct regular supervision of construction works to identify potential OHS risks and compliance with OHS plan Conduct regular supervision of construction works to identify potential OHS risks and compliance with OHS plan 		
	<p>Labor standards are not in accordance to national laws and international standards</p> <p>Poor working conditions: lack of workers' rights</p>	<ul style="list-style-type: none"> Implement and monitor the LMP (see annex 6) Set-up and operate a Labor specific GRM for workers, as per LMP 	IP, PIU	Staff Costs
	<p>Discrimination against women in employment</p> <p>Labor influx leads to increase of GBV cases</p>	<ul style="list-style-type: none"> Implement and monitor GBV Action Plan 	IP, PIU	GBV Action Plan budget: 1,000,0000 USD ³⁷
	<p>Delayed payments / cash transfers may lead to complaints and conflicts</p>	<ul style="list-style-type: none"> Timely payment Communication / awareness campaign of payment mechanisms 	IP, PIU	Staff Costs
	<p>Covid-19 infection risks for workers at site</p>	<ul style="list-style-type: none"> Follow specific Covid-19 guidelines for workers at construction site (see Annex 15) 	IP	IP budget
	<p>Workers coming from infected areas</p>	<ul style="list-style-type: none"> Assuring proper and quick access to appropriate and timely medical services, 		

³⁷ This includes grants for NGOs to provide referral systems where they don't exist and other investments in the GBV system

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Co-workers becoming infected	<ul style="list-style-type: none"> • Educate hand hygiene and PPEs, that is not based on ability to pay or other factors; and 		
	Workers introducing infection into community/general public	<ul style="list-style-type: none"> • Anticipate and address issues resulting from people being kept in quarantine. 		
	Risk of spreading the infection among the workforce and the medical personnel.			
	Workers denied the opportunity to complain they do not have adequate PPE to protect themselves against COVID 19	<ul style="list-style-type: none"> • Grievance Mechanism in place 		
	Risk of the spread of the pandemic among health professionals	<ul style="list-style-type: none"> • Ensure appropriate training on Infectious Prevention and Control for healthcare workers and other staff. • Plan for surge capacity, estimate the needs in terms of patient beds, respiratory support, PPE, staff and diagnostics. Laboratory capacity and therapeutics should also be included in these estimates • Consider restricting non-essential visits and ensure that everyone, including patients and visitors, at the healthcare facility are aware of the need for hand and respiratory hygiene, including suitable cough etiquette • Ensure training in Health care waste management systems, which enable health care waste to be 	IP in collaboration with PIU and MoH	

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
		<p>managed responsibly, without harming the community or the environment.</p> <ul style="list-style-type: none"> • Staff engaged in waste management should wear PPE. • Waste should be treated as infectious clinical waste Category B (UN3291) [30] and handled in accordance with healthcare facility policies and local regulations. 		
	Occupational health and safety risks and hazards associated with fish processing and storage facilities	Follow OHS guidelines set out in General EHSGs and EHSGs for fish processing. LMP and OHS Plan to reflect the necessary policies and procedures for risk assessment and management.	PIU/IP	
<ul style="list-style-type: none"> • ESS 3: Resource Efficiency and Pollution Prevention and Management <p>ESS 3 is relevant for all activities in connection with ecosystem services and the environment; as well as activities that involve civil works.</p>				
<ul style="list-style-type: none"> • Locust control <p>Pesticides used may cause surface and ground water pollution, leading to potential (temporary) reduced availability of drinking-water. Pesticides can get into water through accidental spillage during use or transport, washing of spray equipments after spray operation and aerial spray.</p>				
<ul style="list-style-type: none"> • General Civil Works 				

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
ESS 3	Generation of solid waste,	<ul style="list-style-type: none"> Appropriate designated areas for disposal of solid waste shall be identified in consistent with the local and international requirements. 	IP	IP budget
	Generation of dust and noise,	<ul style="list-style-type: none"> Resource efficiency pollution control measures will be analyzed and incorporated as part of CESMPs 		
	Pollution from construction wastes and water use		IP	IP budget
	Erosion and sedimentation of rivers from earth works and run-off during the construction phase	<ul style="list-style-type: none"> Where feasible, practice minimal or none vegetation disturbance during the implementation of the project, avoid exposing the soils to external weather conditions. 		
	Disposal and management of large amounts of excavated material generated from construction activities during the construction phase	<ul style="list-style-type: none"> Should the project utilize raw materials for construction activities, the material will be sourced through measures specified in Good International Industry Practices (GIIPs). 		
	Increased levels of vibration from moving of construction vehicles and machinery	<ul style="list-style-type: none"> Routine maintenance of the vehicles to reduce the vibrations and air emissions Selecting equipment with lower sound power levels Installing suitable mufflers on engine exhausts and compressor components Installing acoustic enclosures for equipment casing Planning activities in consultation with local communities so that activities with the greatest 		

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
		potential to generate noise are planned during periods of the day that will result in least disturbance.		
	Conflict with the community's use of the proposed source of raw material or degradation of community resources.	<ul style="list-style-type: none"> Ensure thorough consultations are made with the local community leadership and the local authorities on the proposed source of raw materials. 		
	Hazardous waste from paint containers, cleaners, etc. and waste petroleum produces (e.g., oil, grease, etc.) and batteries	Hazardous waste management procedures implemented	IP	IP budget
	Droughts and floods may have potential impacts and risks and may warrant modification of certain mitigation measures	Procedure to deal with construction during drought and flood events (similar to emergency procedure) as	IP	IP budget
<ul style="list-style-type: none"> Desiliting of weirs / boreholes / springs / sanitation systems / irrigation schemes / rehabilitation of facilities 				
	Soil Erosion during desilting of weirs/dams and reinforcement of river banks	<ul style="list-style-type: none"> Implement soil control measures 	IP, PIU	Staff costs, IP budget
	Water contamination from oil spills during works.	<ul style="list-style-type: none"> Implement water pollution control measures 		

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Disturbance of flora and fauna (terrestrial and aquatic) during construction of piped water schemes	<ul style="list-style-type: none"> Implement measures to protect against disturbance of flora and fauna 		
	Irrigation water with high Total Dissolved Solids (TDS) may lead to salinization of the soils. Acceptable limit is 1,500 ppm.	<ul style="list-style-type: none"> Conduct analysis of irrigation water to ensure water with TDS above 1,500ppm is not used for irrigation. 		
	Fisheries water quality deterioration during the operations	<ul style="list-style-type: none"> Conduct analysis of fisheries water quality to ensure Dissolved Oxygen is above 3mg/L, suitable for aquaculture activities 	IP working in collaboration with local council	
	Potential groundwater depletion due to increase in ground water withdrawals	<ul style="list-style-type: none"> Ensure water balance is determined which will guide on the amount of water to be abstracted, and subsequently eradicating uncontrolled water abstraction by the relevant authorities such as the local council 		
	Shallow water table is commonly contaminated with coliforms, fecal coliforms, fluorides, and nitrate. These contaminants can cause moderate to high	<ul style="list-style-type: none"> All open wells must have a parapet wall. Preferably cover the well with an appropriate roofing structure to avoid contaminants in the well for this reason, and to minimize instances of people/animals falling into the well Method of drawing water from open wells should not be labor intensive. 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	significance health impacts on the communities	<ul style="list-style-type: none"> Community groups to receive guidance on hygiene practices in and around the water point to avoid potential contamination of the water sources. 		
	<ul style="list-style-type: none"> Health Care provision <p>Health care waste risks leading to contamination through medical waste that is not properly disposed (infections, pollution/contamination of the environment – air, land, water physical injuries, effect on domestic animals)</p>	<ul style="list-style-type: none"> Implement and monitor health care waste management procedures based on <i>WBG Environmental, Health, and Safety General Guidelines</i>, including training of health care workers and auxiliary staff on how to safely handle health care waste up to final disposal of the same Provide adequate and appropriate protective clothing; use appropriate types of polythene bags and containers for waste; appropriate storage of health care waste until end of day; treat health care waste appropriately at hospitals, etc....). 	IP	IP budget
	Risks of water borne diseases for health care facilities with inadequate portable water	Prove adequate portable water at the affected health care facility, as this is critical to achieve acceptable public health/hygienic conditions.		
	Risks of handling and disposal of hazardous/medical waste (Covid-19)	<ul style="list-style-type: none"> Follow infectious and medical waste management plan (see annex 14) Ensure incineration of all the delivered hazardous waste and appropriate disposal of the resulting ash at a landfill. 	IP	IP budget
	Poor management of healthcare waste leading to contamination of the environment	<ul style="list-style-type: none"> Conduct due diligence to examine its technical adequacy, process capacity, performance record, and operator's capacity. In case any gaps are discovered, corrective measures are recommended and implemented 	IP working in collaboration with MoH representative	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Inadequate facilities and processes for treatment of waste	<ul style="list-style-type: none"> • Estimate potential waste streams • Consider the capacity of existing facilities, and plan to increase capacity, if necessary, through construction, expansion etc. • Specify that the design of the facility considers the collection, segregation, transport and treatment of the anticipated volumes and types of healthcare wastes • Require that receptacles for waste should be sized appropriately for the waste volumes generated, and color coded and labeled according to the types of waste to be deposited. • Develop appropriate protocols for the collection of waste and transportation to storage/disposal areas in accordance with WHO guidance. Design training for staff in the segregation of wastes at the time of use 	IP working in collaboration with local council	IP budget
	Use of incinerators results in emission of dioxins, furans and particulate matter	<ul style="list-style-type: none"> • Where possible avoid the use of incinerators • If small-scale incineration is the only option, this should be done using best practices, and plans should be in place to transition to alternative treatment as soon as practicable (such as steam treatment prior to disposal with sterile/non-infectious shredded waste and disposed of in suitable waste facilities) • Do not use single-chamber, drum and brick incinerators • If small-scale incinerators are used, adopt best practices to minimize operational impacts. 	IP working in collaboration with Ministry of Health	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Risk of infection	<ul style="list-style-type: none"> • A specimen received by the laboratory must be accompanied by sufficient information to identify what it is, when and where it was taken or prepared, and which tests and/or procedures (if any) are to be performed. 	Ministry of Health, monitored by IP representative	IP budget
	Risk of getting spoiled sample	<ul style="list-style-type: none"> • Specimens must be stored in containers with adequate strength, integrity, and volume to contain the specimen, and that are leakproof when the cap or stopper is correctly applied. • Use plastic containers for storage whenever possible that are free of any biological material on the outside of the packaging. • Correctly label containers, marked and recorded to facilitate identification, and made of an appropriate material for the type of storage required 		
	Waste segregation, packaging, color coding and labeling - Risk of infection to the handlers (specimen) Onsite collection and transport - Risk of infection to the handlers due to secondary handling Waste transportation to and disposal in offsite treatment and disposal facilities - Entails the	<ul style="list-style-type: none"> • Segregate medical/health care waste at generation point • Place the different types of medical/health care waste in secured bags colour-coded and labelled • Routing and scheduling can be figured out by trial-and-error or by heuristic routing approaches which take into account traffic patterns at different times 	Ministry of Health Officer, working in collaboration with IP representative Ministry of Health Officer, working in collaboration with IP representative IP in consultation with the local authority	MoH budget MoH budget IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>carriage of healthcare waste through public streets which can be a risk in case of an accident or mere spill of health care waste</p> <ul style="list-style-type: none"> Sanitation <p>The pit latrines and septic tanks if not well sited and maintained will be a source of foul smell that will affect those within the area and eventually source of groundwater contamination</p> <p>Faecal matter may lead to underground water contamination if the water table is high or in the case of pit latrines, when there is an overflow due to heavy rains. Contamination of water may lead to outbreak of diseases e.g. cholera, dysentery, typhoid, diarrhoea etc.</p> <p>Pit latrines can also be breeding grounds for flies</p>	<p>of day, street configurations, on which side of the road the majority of facilities are situated, ground</p> <ul style="list-style-type: none"> Ensure a waste tracking system as part of a cradle-to-grave approach to waste management and in keeping with the “duty of care” principle is put in place 	IP	IP budget
		<ul style="list-style-type: none"> Ensure proper siting of septic tanks and pit latrines in accordance with the MOH guidelines for siting and construction of pit latrines Ensure the number of latrines and septic tanks not lined with concrete or HDPE liner are guided by the population in the area. Taking ratio of latrines to population to a minimum of one latrine to 50 persons for communal ones, this guideline will regulate the no. of latrines in an area. The Sphere project recommends ration of 1:20 (one latrine to 20 persons³⁸) 	IP	IP budget
		<ul style="list-style-type: none"> Ensure proper maintenance of sanitation facilities including cleaning and hygiene training 	IP	IP budget

³⁸ The Sphere Project, 2011, Humanitarian Charter and Minimum Standards in Humanitarian Response

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	and mosquitoes which are disease vectors			
	Super structures if poorly constructed and designed could lead to hazards including falling into the pit if the super structure floor/slab gives ways. This can lead to injury or loss of life.	<ul style="list-style-type: none"> • Ensure super structures are well constructed including the slab with the required strength 	IP	IP budget
	Common pests attracted to dirty environment are rats, cockroaches, flies. These animals are also disease vectors. They transport germs from the toilet to nearby human settlement.	<ul style="list-style-type: none"> • Provide hand washing facilities and water in all the sanitation infrastructures • Ensure proper cleaning of toilets • Ensure and provide training on cleaning of toilet • Use biopesticides to manage pests 	IP	IP budget
	<ul style="list-style-type: none"> • Discharge of Waste 			
	Generation of a wide range of waste effluents (waste water from washing and cleaning operations, oils and oily water generated by machinery maintenance, leaked/spilled fuels and oils, waste effluent discharges from the	<ul style="list-style-type: none"> • Design activities employing technologies that are least polluting; • Carry out treating and recycling of waste effluents as far as possible and practical before safely being discharged in designated areas or reused 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	processing operation, animal wastes, and others)			
	Uncontrolled discharges of these wastes and other effluents can potentially contaminate the soil, pollute the nearby water bodies and degrade their value for communities and ecology.	<ul style="list-style-type: none"> • Ensure that waste is not released into any drinking water source, cultivation fields, or critical habitat • Waste effluents will be not be released in irrigation channels 	IP	IP budget
	Generation of large amount of waste water, primarily for washing and cleaning purposes of fish.	<ul style="list-style-type: none"> • The process generally also requires large amounts of water, primarily for washing and cleaning purposes, but also as media for storage and refrigeration of fish products before and during processing. Management and disposal of wastewater is therefore an environmental concern 		
• Solid Waste				
	Generation of solid wastes (including human and animal secreta, wastage from packing operations and others)	<ul style="list-style-type: none"> • Minimize use of non-biodegradable substances (e.g. for packaging) • Minimize generation and Recycle solid waste as far as possible and practical • Adopt composting of biodegradable waste if practicable • Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, cultivation fields, irrigation channels, natural drainage paths, wetlands and critical habitat, 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>Inappropriate disposal of these wastes can potentially have negative environment and ecosystem impacts in the area, while also contaminating soil and water</p> <p>Inappropriate disposal of;</p> <p>a) Large quantities of organic waste and by-products from inedible fish parts during the fish processing activities.</p> <p>b) Generated waste from the construction of fish infrastructure.</p> <p>Rehabilitation of larger irrigation schemes and fish processing activities can lead to water pollution</p>	<p>the existing waste management system in the area, local routes, and general aesthetic value of the area</p> <ul style="list-style-type: none"> • Ensure the protection of disposal areas • Ensure that disposal of waste will not be a danger to children • Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal 		
			IP	

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
ESS 4	<ul style="list-style-type: none"> • Comply with general EHSGs, EHSGs for Fish Processing, and EHSGs for Water and Sanitation 			
	<p>• ESS 4: Community Health and Safety</p> <p>ESS 4 is relevant for activities around locust control, labor used for civil works activities, cash transfers and cash for work, community infrastructure works, debris removal, water and irrigation schemes and sanitation.</p>	<ul style="list-style-type: none"> • Locust Control/Fisheries Programme 		
	<p>Settlements nearby spray area may be affected by activities around pesticide storage, accidentail spillage, contaminated equipment, overspraying, entry into sprayed area and exposure to empty pesticide containers</p> <p>Pollution of communal drinking water due to insectizides</p> <p>Community health and safety risks through exposure to pesticide through potential involvement in Desert Locust control (help localize spray targets) or through consumption of contaminated food grown in sprayed areas</p>	<ul style="list-style-type: none"> • Implementation and monitoring of PMP • Informing of inhabitants of the zone in which the treatments take place of the operation beforehand, warnings not to come close • Selection of the right insecticide for a given situation or environment, using the appropriate control strategy and method, and strictly applying environmental protection measures where possible • Control teams ensure that nobody is present in the area to be sprayed • Robust information dissemination on the timing and mode of spraying to ensure the community can be protected as appropriate • Support the sheltering and protection of vulnerable members of the community from harful effects of spraying 	<p>FAO, PIU</p> <p>FAO/IP</p>	<p>Cost covered in PMP</p> <p>Cost covered in PMP</p>

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Livestock will graze on green pastures just like locusts and insecticide residues can end up in meat and milk after locust control operations.	<ul style="list-style-type: none"> Villages or habitations, open water and nature reserves will be off limits for all insecticide treatments against locusts. Wells or waterholes that lie in the area in which treatments take place will be covered up. Beehives will also be covered up temporarily to protect them further from any unexpected spray drift. 		
	<ul style="list-style-type: none"> Labour influx 			
	Increased GBV/SEAH cases	<ul style="list-style-type: none"> Impacts of labor influx driven by the small-medium scale infrastructure works will be managed by the LMP, including a code of conduct for project workers Implementation and monitoring of GBV / SEA H Child Protection Prevention and Response Plan Community awareness sessions on communicable diseases 	IP	IP budget
	Spread of communicable diseases (SII, HIV/AIDS etc..)			
	<ul style="list-style-type: none"> Security 			
	Security risks for all project workers, communities, beneficiaries and other project-affected parties largely characterized by a dire humanitarian situation due to multiple and simultaneous crises afflicting the country compounded by weak and developing government systems	<ul style="list-style-type: none"> Partner these organizations with local NGOs that have a good understanding of local dynamics an important factor in managing exposure to security threats Implementation of the Security Management Plan (SMP) 	IP / PIU	IP budget / SMP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>Provision of cash support for affected households, cash for work and unconditional cash transfers raise the profile for targets by opportunistic armed actors in a context of recent history of relative lawlessness and the potential for increased conflict.</p>	<ul style="list-style-type: none"> Involve UNOPS and other humanitarian and development organizations with valuable knowledge and experience in delivering specialized operations in the target locations and provide relative advantage to challenges of access to site and the identification and mitigation of security threats to project operations 	IP	IP budget
	<ul style="list-style-type: none"> Harmful Inward migration <p>Harmful inward migration as the project will mainly operate in a small number of sites relative to immense and widespread need, possibility of population influx from neighboring district and locations</p>	<ul style="list-style-type: none"> Selection of priority areas guided by findings and recommendations from FINA 	IP, SPTs, MDAs, Staff costs PIU	
	<p>Upsetting of community dynamics and perpetuated clashes and animosity exacerbating social and environmental fragility</p>	<ul style="list-style-type: none"> Proper and transparent targeting of vulnerable populations, ensuring inclusion in particular for displaced populations, for cash-based interventions and the small amounts of transfers is seen as a mitigating measure against harmful inward migration 	IP, SPTs, MDAs, Staff costs PIU	

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
• GBV Risks				
	Potential risks of gender-based violence increase with the receipt of cash transfers by women and children (within households or at payment points)	<ul style="list-style-type: none"> Implement and monitor GBV/SEAH Child Protection Prevention and Response Plan 	IP, PIU	IP budget, GBV Action Plan budget
	Risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors, extending from registration or release of funds	<ul style="list-style-type: none"> Engage a dedicated GBV specialist to support PIU oversight and management of these risks 		Staff costs, GBV service provider: 500,000
	Increased GBV risks based on the design and location of infrastructure, maybe designed without taking into account women and girls safety considerations (privacy, location), dignity (privacy and women's requirements for use) and accessibility (no ramps etc) to facilitate access for persons with disabilities.	<ul style="list-style-type: none"> Ensure design of infrastructure meets the needs of all women and girls, including safety, accessibility (based on universal design) and dignity Safety audits will be developed for all relevant activities to ensure protection and security of affected communities and alignment with global protection standards TPM to monitor implementation of GBV risk management activities 	IP	IP budget
• Community Infrastructure				

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Exposure of community members to physical hazards on project sites	<ul style="list-style-type: none"> Undertake safety precautions to address safety hazards for the nearby community, including, safety/warning signage, safety barrier around the construction site, and safe driving practices 	IP	IP budget
	Traffic and road safety hazards	<ul style="list-style-type: none"> Informing public about potential construction risks 		
	Health issues including water-borne and vector borne diseases resulting from poor site management such as stagnant water	<ul style="list-style-type: none"> Simplified E&S construction checklists to be included in the civil works contracts, as part of C-ESMP Ensure good house keeping at every work sites 	IP	IP budget
	<ul style="list-style-type: none"> Debris Removal <p>Removal of debris affects new location aesthetically Debris removal poses a safety risk for the community at the new location</p>	<ul style="list-style-type: none"> Implement and monitor waste management procedures based on <i>World Bank Group Environmental, Health, and Safety General Guidelines</i> 	IP	IP budget
	<ul style="list-style-type: none"> Water and irrigation schemes <p>Health impacts on communities through contamination of open wells (with coliforms, fecal coliforms, fluorides, and nitrate)</p>	<ul style="list-style-type: none"> Community groups to receive guidance on hygiene practices in and around the water point to avoid potential contamination of the water sources 	IP	IP budget
	Lack of community ownership operation and	<ul style="list-style-type: none"> Site selection to be based on community engagement for the protection of these sites, in 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	maintenance of water infrastructure and its long-term	<p>order to ensure community ownership from the onset</p> <ul style="list-style-type: none"> • Ensure that the sites of these projects will not pose a danger to children and will be properly fenced with messages shared to the community on maintaining the safety • Ensure that there will be no risks to women and girls from accessing these facilities • Ensure that these points are designed in such a way that promotes accessibility to people with disabilities 		
	Sustainability of water infrastructure will be hampered should systems be built without considerations for how systems are managed, ran and financed in the future	<ul style="list-style-type: none"> • Ensure that for each water point constructed, a community group is set up, with the sole purpose of operating, maintaining and managing the overall system 	IP	IP budget
	<ul style="list-style-type: none"> • Sanitation schemes 			
	Latrines have the possibilities of spread and contact of pathogens and other pollutants with the humans at the household level	<ul style="list-style-type: none"> • Train communities on better hygienic and sanitation practices (e.g. washing hands with soap after defecation, no open defecation in and outside house) as well as on maintenance and cleanliness practices (e.g. daily or twice a day cleaning of latrine). • Make gender marking for men/women clearly visible • Whenever drains will be improved or lined then these must be converted into covered drains • Provide alternative drainage system during construction of drains to reduce the inconvenience 	IP	IP budget
	In open drains the possibility of human-pollution contact remain high, these drains only serve the purpose of			

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>conveyance, and throughout conveyance human-pollution interaction remain active. This interaction causes serious negative impacts on the community health</p> <p>Latrine usage and maintenance can be at risk should communities fail to recognize the health benefits linked to such technology</p> <p>Proliferation of vectors which increase the risk of epidemic outbreaks</p>	<p>to the community and reduce the possibility of human-pollution interaction</p> <ul style="list-style-type: none"> For oxidation ponds or septic 6 inches lining by puddle clay should at least be built if not concrete or brick lining Mechanisms exist for community to bring forth any complaints/feedback concerning the construction, use and maintenance of these facilities Locate facilities in a location that is safe for women, girls and young children to use without risks to safety and security Construct facilities in a manner that will be accessible to children and persons with disabilities Provide training for management and control of vectors to minimize the epidemic outbreak risk Provide training to participants for the operation and maintenance of the sanitation facilities (the training should include the identification of risks and mitigation measures) Conventional or flush latrines should be linked with P-traps Training of participants on the operation and maintenance of the sanitation facilities to ensure reduced air pollution, among others. 		
	<p>• Health facilities</p> <p>Health facilities due to poor working practices are one of the important sources of spread of different diseases in the community. Most</p>	<ul style="list-style-type: none"> Provide equipment for used needles and syringes crushing, and instruct management to practice the crushing of used needles and syringes Provide training for management and control of health waste Ensure good house keeping 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	important poor practices are: improper sterilization of equipment, reuse of used needles & syringes, and unsafe disposal of hazardous waste			
	Health waste can be a serious human hazard	<ul style="list-style-type: none"> • Safely dispose hazardous waste generated by health facility by providing disposal pit located within the facility. Lined and covered pit is constructed with a capacity to accommodate six months to one-year hazardous waste. The pit should be designed in manner that it is sealed and only a small hole with a cap is available for disposing and compacting the hazardous waste. Once the pit is full to its capacity, then it is completely sealed and a new pit is constructed within the premises. • For every three health projects, one incinerator shall be built at one of the health projects to ensure safe disposal of health care waste 	IP	IP budget
	Design, construction and operation of infrastructure can pose a safety risk for third parties and affected communities	<ul style="list-style-type: none"> • Structural elements to be designed and constructed by competent professionals and certified and approved by competent professionals 	IP	IP budget
	Public's potential exposure to operational accidents or natural hazards	<ul style="list-style-type: none"> • Where the project involves provision of services to communities, establish and implement appropriate quality management systems to anticipate and minimize risks and impacts that such services may have on community health and safety. In such 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
		circumstances, also apply the concept of universal access, where technically and financially feasible.		
	Occurrence of emergency events (natural and man-made hazards, e.g. fire, explosion, leaks or spills...)	<ul style="list-style-type: none"> Design measures to address emergency event in a coordinated and expeditious manner to prevent injuries, H&E of the community and minimize impacts Conduct risk hazard assessment (RHA) as part of ESMP/ESIA Follow GIIP guidelines set out in the EHSGs for fish procesing 	IP	IP budget
	Health and safety risks associated with fish processing and storage facilities		IP	IP budget
	Increased risk of GBV cases (including IPV) in community and at workplace, since activities in the fishing sector will directly benefit and likely empower women with improved livelihoods opportunities and decision-making power.	<ul style="list-style-type: none"> Implement GBV Action Plan in AF activity locations 	IP	IP budget
	Dam safety issues	<ul style="list-style-type: none"> Conduct study of critical water management infrastructure or dam safety assessment and undertake necessary actions 	PIU/IP	Assessment costs: 100,000 USD
<ul style="list-style-type: none"> ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement <p>ESS 5 is relevant for the reconstruction and rehabilitation of affected basic social and physical infrastructure.</p>				
ESS 5	Key public amenities may have been converted to formal and informal camps	<ul style="list-style-type: none"> Implementation and monitoring of Resettlement Plan (RAP) 	IP / PIU	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	for accommodating persons displaced by the conflict, which will necessitate the relocation of already displaced people	<ul style="list-style-type: none"> • If trees are to be cut for any subprojects, the farmer/beneficiary will carry out compensatory plantation of appropriate indigenous tree species. Trees thus planted will be at least four times the number of trees felled for establishing the subproject. 		
	Loss of assets, sources of income, or means of livelihoods	<ul style="list-style-type: none"> • Implementation of E&S screening processes that exclude project activities leading to massive displacement impacts 		
	With weaker or nonexistent formal land administration authorities, processes for land expropriation compensation may not be in place or fully established. As a result, resettlement as well due diligence for establishing ownership for voluntary land donations may be challenging	<ul style="list-style-type: none"> • Community consultations to be conducted before establishing facilities (SEP) 	IP	IP budget
	Disputes over land ownership	<ul style="list-style-type: none"> • Implement and monitor GRM 	IP	IP budget
	Blocked access to people in the area	<ul style="list-style-type: none"> • Ensure that the local routes, drainage and community access are not blocked by such schemes 	IP	IP budget
	Road construction and expansion and / or upgrade of fisheries might require acquisition of land, houses, buildings and	<ul style="list-style-type: none"> • Implementation and monitoring of Resettlement Action Plan (RAP) 	IP / PIU	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>other physical infrastructure</p> <p>Encroachment on private and public land: Sub project activities may require land that is possibly claimed or owned by someone.</p> <p>Firming up conflict over land ownership by making people need to claim land rather than share. Sub projects may require land, which may lead to individuals making land claim to proof land ownership prior to sub project commencement – in the hope of reimbursement, for example. This may foster conflicts over local land use, tenure and ownership, and also contradict encouragement of communities to share land</p> <p>Risks arising from displacement impacts and restrictions to land use</p>	<ul style="list-style-type: none"> Inform the concerned communities about detailed activity plan including alternate route during construction, secure community consent, and implement all the safeguards agreed with the community. <p>Relocation or displacement of people should be avoided to the greatest extent. However, once determined that the fish sub-project shall lead to a loss of assets, sources of income, or means of livelihoods, the</p>	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	associated with water supply and fishing input infrastructure.	Resettlement Planning Framework (PPF) already will be strengthened to ensure security of tenure where the development of Resettlement Action Plans (RAP) is required. The Livelihood Restoration Plan updated to reflect this impact and to form part of the Resettlement Action Plan.		
<ul style="list-style-type: none"> ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources <p>ESS 6 is relevant for activities in regards to locust control and civil works.</p>				
<ul style="list-style-type: none"> Locust control 				
ESS 6	<p>The locust crisis intervention support through spraying may affect important natural resources or ecological functions on which local populations depend (e.g. bees provide honey, wax and the essential pollination of many crops but they are also very susceptible to insecticides. Many wasps, flies, spiders and beetles prey on crop pests; if these natural enemies are killed by insecticides, pests may become a problem for farmers)</p>	<ul style="list-style-type: none"> Implement and monitor PMP Restrict use of obsolete pesticide stocks in the country During campaign planning all areas in the country will be identified that are ecologically and agronomically important or particularly sensitive to insecticides. For each sensitive area, locust management options will be evaluated, based on the type of organisms at risk and the likely locust targets that may appear in the area. Subsequently, appropriate locust control techniques will be identified for each area. These include the decision to allow chemical control or not, the choice of acceptable insecticides, periods when treatments are or are not allowed, appropriate control methods, etc. Sensitive areas will be mapped with overlays of previous (or newly expected) locust infestations 	FAO / PIU	Cost covered in PMP

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<ul style="list-style-type: none"> • Other <p>Sensitive areas may be impacted by project activities</p>	<ul style="list-style-type: none"> • Screening process will identify potential impacts on sensitive areas • Avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas, implement RPF • Site selection will include an analysis of the immediate area in terms of population, buildings, slope, nearby wadis/seasonal water flows, and will exclude those which may be adjacent to areas with environmental sensitivities 	IP	IP budget
	<p>Changes in land form and habitat, habitat fragmentation, blockage of migration paths, water consumption and contamination.</p>	<ul style="list-style-type: none"> • Restore and landscape any affected areas 	IP	IP budget
	<p>Unregulated Fishing: Lack of management of coastal fisheries may lead to further unregulated fishing and impacts such as overfishing</p>	<ul style="list-style-type: none"> • Provide training to fishing communities on sustainable fishing practices • Fishers to sign Code of Conduct for Responsible Fisheries, setting out good practices for governments and fishers. 		

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>Loss of precious ecological assets, if they are inappropriately located they could cause secondary encroachment into historical/cultural buildings/areas, disrupt hydrology of natural waterways, regional flooding, and drainage hazards</p> <p>Disturbance of natural habitats during construction of fish infrastructure</p> <p>Decline of fish stocks/fish species</p>	<ul style="list-style-type: none"> • No or minimized removal of flora or wildlife in protected or sensitive areas shall be allowed • Ban use of firewood for fuel on any construction camps or areas • Ban hunting and game consumption on construction site and all construction workers • Limit plant removal to grasses, weeds or small bushes • For any plant removal or tree felling, four replacement plants should be replanted • Survey the project area before any works, to identify, categorize, and delineate natural and modified habitats and ascertain their biodiversity importance at the national or regional level • Ensure that the area to be used for construction of relevant infrastructure does not represent a habitat that is unique or protected (such as mangrove areas), or includes high biodiversity value, such as known sites of critically endangered or endangered species. • Ensure effective community engagement and fishermen and discuss fishing methods among other parameters, in the quest to manage fish stocks in the water bodies • Take precautionary approach. • Provide training to fishers, • Conduct data analysis and surveys on fish stocks based on existing biodiversity information 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
ESS 10	<p>Inadequate, ineffective and inappropriate stakeholder and community engagements and disclosure of information can lead to the exclusion of truly vulnerable, marginalized and minority members of the community from project benefits, amplified by the context of limited resources against widespread need.</p> <p>Project benefits are diverted to less-deserving individuals</p> <p>Poor access to beneficiaries lead to less meaningful community engagements and difficulty in monitoring for social harm</p> <p>Covid restrictions pose challenges to community engagements</p>	<ul style="list-style-type: none"> Implementation and monitoring of SEP Conduct additional stakeholder consultations for the AF considering vulnerable households in farming communities and remote coastal fishing communities. <ul style="list-style-type: none"> Implementation and monitoring of GRM Implement WB guidelines on community engagements under COVID-19 	IP	IP budget IP budget IP budget

Institutional and Implementation Arrangements

Implementation of Component activities approved by the PSC at the federal level will be led by the PIU, which will be located in the MoF. The PIU, under instruction from the PSC and in consultation with state-level Ministries of Planning, and with technical support from the World Bank and UNOPS, will contract out the detailed design and implementation of Component activities.

FMS MDAs will identify sub-project interventions under the investment plans and prepare subproject designs and bidding documents in consultation with FGS MDAs, as well as support the procurement of contractors. FMS MDAs will also be responsible for contractor and site supervision, technical quality assurance, certification, and payment of works.

Implementing Partners (IPs) will be contracted by the PIU and/or MDAs to lead the detailed design of the sub-projects or activities, mainly in Component 2, including engineering design for some works. The PIU will be responsible to assist with the E&S screening process where necessary and to approve screening results and subsequent E&S plans, and to monitor and supervise the implementation of all E&S risk mitigation measures.

The IPs will thereby fulfill all requirements of this ESMF, associated E&S instruments and activity-specific E&S instruments. This will also include the implementation of the SEP, which will be done in close cooperation with SPTs and MDAs (usually located in the FMS Ministry of Planning). These will assist in engaging targeted communities to ensure project design properly reflects local-level needs. The IPs will further draw on local NGOs and CSOs to facilitate the stakeholder engagements at the local level and facilitate IVA activities. The SEP is presented in a separate document, and is currently being updated through community consultations. An updated version is expected by 15 July.

With design and E&S screening and mitigation measures approved by the PIU, the IP will lead activity implementation, working closely with relevant FMS technical MDAs to ensure activity compliance with federal and state technical standards, and with this ESMF.

The overall responsibility for monitoring and supervision of this ESMF will lie with the PIU.

The PIU will consist of one environmental specialist and one social specialist, both with at least 8 years of experience in the implementation of safeguards in their respective fields. Both will staff the Risk Management Section within the PIU and will report directly to the Project Coordinator in the PIU. Their key tasks will be the analysis of environmental and social risks related to the project; the overseeing of all partners' implementation of this ESMF and associated instruments, the monitoring of the same; the facilitation and monitoring of stakeholder engagements including GRM. They will make recommendations on how analytical and consultation outcomes should be taken up in activity specific ESMPs and other action plans and monitor the implementation of the same; they will coordinate and monitor the implementation progress of the E&S instruments and make recommendations for changes where necessary. The overall responsibility for the implementation of all E&S instruments lies with the Director of the PIU. The PIU will review and approve all sub-project screening results, ESMPs, ESIAs and other E&S plans and instruments (see below), as well as implement E&S training for partners.

The PIU will further support stand-by consultant expertise on issues such as GBV, resettlement and labor issues, and OHS. It will also include a plant protection / pesticide specialist from the Ministry of Agriculture, as implementing agency partnering with FAO on the locust control activities.

All IPs receiving funding for project implementation must demonstrate sufficient E&S capacity among its staff in order to design and implement the necessary E&S measures. The PIU will approve demonstrated staffing capacity of the respective CSO, together with approval of general project activities.

The PIU staff will work closely with the Ministry of Environment for any project clearance issues. It will work closely with state and local authorities (formal and informal) in regards to project planning and implementation, especially in view of stakeholder consultations, communication and coordination.

The PIU will receive support from UNOPS in project management, including E&S safeguards implementation; and FAO will be assisting the implementation of the Pest Management Plan (PMP) in regards to Component 1.

Table 1: Matrix of Responsibilities, including safeguards

PIU	FGS and FMS MDAs	SPT
<ul style="list-style-type: none"> • Coordinating prioritizing and sequencing exercises and investment planning • Quality and process oversight • Procurement of goods and services • Seeking World Bank no-objections • Contract management oversight and controls • Financial reporting • M&E • Prepare project compliance reports • Certification of progress reports • safeguards (ESCP) compliance and monitoring including establishing and operating grievance redress mechanism • communications, awareness and outreach, and audits and reporting; 	<ul style="list-style-type: none"> • Identification of sub-Project interventions under the investment plans • Preparation of subproject designs • Preparation of sub-Project bidding documents • Supervision consultants • Site supervision and technical quality assurance • Operations and maintenance • Certification and payment of works 	<ul style="list-style-type: none"> • District-level community consultations • Review, compliance and supervision of works • Review procurement plans to assure compliance with World Bank standards • Provide coordination supports to the MDAs and Implementing Partners • Assist PIU to manage the local grievance redress mechanisms, ensure compliance with the ESCP, the ESSs and applicable safeguard documents; and carry out community outreach,

		awareness raising and consultations
--	--	-------------------------------------

Social and Environmental Risk Classification

The primary beneficiaries are populations in rural areas, especially those most affected by the infestation, including farmers, agropastoralists, pastoralists, fishermen and rural IDPs (displaced due to various factors and living among host communities in rural areas) that benefit from the risk mitigation infrastructures and crisis response activities. Through strengthening of disaster risk management systems and institutions, the project has the potential to benefit the entire Somalia. Whereas project activities are expected to have substantive positive impacts, there are adverse residual risks. Both, environmental and social risk classification for the Project is considered 'High'.

Screening Process and Requirements for Sub-Projects

The E&S screening process is designed to identify and appraise the type and scale of any adverse environmental and social impacts or risks that may arise from a planned sub-project or site-specific activity. The next step, once the relevance of such risks or impacts has been established, is to define the type and scope of additional assessments and management plans which need to be conducted or developed as part of requirements under this framework.

E&S Screening Process: IPs will need to conduct the E&S screening process of a planned activity prior to the commencement of the activity. The SPT or PIU will provide oversight and assistance to E&S screening processes, while IPs are responsible for the screening of all their respective activities. The screening will be based on the site- or project-specific Social and Environmental Screening Process and Report (see template in annex 1), and therefore will have to be implemented following the attached format by the environmental and the social specialists of the respective IP. The E&S screening will help filter out activities that are not eligible under this Project, including those with too high risk and potential negative impact on the environment or society.

The screening of sub-projects or site-specific activities will allow to estimate the risk level, based on the intrinsic environmental and social risks associated with a) the type of intervention to be carried out, and b) the type of infrastructure proposed. Where a single sub-project includes multiple types of activities or infrastructure, the risk rating will be assigned on the basis of the highest level or risk applicable for any component of the sub-project or activity, unless an exclusion risk is provided beforehand. Furthermore, the screening results will help advise which instruments will be relevant or required for which activity, for example, RAPs, LMPs, C-ESMPs etc... The Screening report will help to determine which ESF standards are applicable and which steps need to be taken and which provisions or procedures apply, as laid out in the ESMF.

Other critical issues identified during the screening may require closer investigation during potential ESAs. The risk level assigned to a sub-project or site-specific activity will determine if an Environmental and Social Impact Assessment (ESIA) and/or an Environmental and Social Management Plan (ESMP) are

required before the activity can commence (see template for Social and Environmental Screening Process and Report, annex 1).

World Bank Approval: The PIU is expected to review for adequacy the management plans / C-ESMPs submitted by the IP before they can be submitted to the World Bank for approval. The PIU will exert quality control in compliance with World Bank ESSs. It will review environmental and social instruments proposed and applied by IPs to ensure that these instruments are in compliance with the applicable ESSs objectives and requirements.

Disclosure: The World Bank disclosure standards require that the ESMF report for the project is made available to project affected groups, local NGOs, and the public at large. A summary version will be translated into Somali. The PIU will make available copies of the ESMF, sub-project ESIA/ESMPs and any other instruments developed for subprojects at strategic locations and offices of the ministries, according to the SEP.

Implementation: The Technical Specifications of the Project contract document shall include a section that will direct the respective IPs to prepare ESMPs and C-ESMPs and where applicable prepare the ESIA consistent with the provisions in the ESMF. Additional environmental, social, gender, health and safety analyses and documents can be provided as reference to help Bidders understand what will be required to implement the environmental and social measures associated with this project. The PIU, working in collaboration with the Project Steering Committee can coordinate the procurement process, which includes the preparation of the Bidding Documents.

During the actual implementation of the activity, the respective IPs will be expected to adhere to the approved ESMPs. The PIU will be responsible for ensuring the IP conduct the activities in compliance with the approved ESMPs.

Monitoring Plan and Institutional Arrangements

The goals of monitoring are to measure the success rate of the activities, determine whether interventions have handled negative impacts, and whether further interventions are required or monitoring is to be extended in some areas. The goal of inspection activities is to ensure that sub-component activities comply with the plans and procedures laid out in the ESMF and in activity-specific instruments.

The main monitoring responsibilities and inspection activities will be with the PIU, which will administer the overall project-related environmental and social monitoring and implementation as laid out in this ESMF, as well as the SEP. The Project Coordinator in the PIU will have overall responsibility for the implementation of the environmental and social mitigation measures, as well as for monitoring and inspections for compliance. The Environmental and the Social Specialist in the PIU will be handling the day-to-day tasks in regards to the implementation of the ESMF and associated instruments.

The PIU Environmental and Social Specialists will assess the compliance of all implementers/contractors' activities against the ESMF and their subsequent ESMPs, and will report possible non-compliance to the Director 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, including construction companies, to ensure they are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts.

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.³⁹

³⁹ Frequency will be determined by the need but expected to be more frequent at early stages of project implementation

1. Introduction

This ESMF was originally prepared for the Somalia Crisis Recovery Project (SCR), the parent project in May 2020. Additional Financing (AF) was approved in June 2021. As a provision in the AF ESCP, the ESMF was to be updated within three months of Project Effectiveness and prior to disbursement for activities under the AF. The ESMF should cover both parent project and AF financed activities. Along with the ESMF update, other E&S management instruments and tools including the Stakeholder Engagement Plan, Security Management Plan (SMP) and Resettlement Policy Framework (RPF) have also updated three months after Project Effectiveness..

The humanitarian situation in Somalia is deteriorating due to the multiple and simultaneous crises afflicting the country, including drought, floods, conflict, and locust infestations, all within the same time and space. Presently, 5.2 million Somalis need humanitarian assistance, while 1.3 million face severe hunger. Considered the most vulnerable country to climate change in the world, the intensity and frequency of climatic events facing Somalia is expected to increase in the coming years. Combined with other development challenges, such as poverty, inequality, and capacity constraints due to more than two decades of conflict, these crises are undermining the country's political and economic gains.

Parts of Somalia are experiencing the worst flooding in the country's recent history. The Deyr rains are seen in Somalia each year, usually lasting from September to November or December. In late October and November 2019, moderate to heavy rains caused substantial flooding in low-lying areas along the Shabelle and Juba rivers, resulting in several deaths and significant damage to infrastructure, crops, property, and livestock, affecting more than a half million people across 17 districts in ten regions in the three states of Jubaland, Hirshabelle, and Southwest, with 370,000 people displaced from their homes. Most flooding occurred in the regions of Middle and Lower Juba, Bay, Lower and Middle Shabelle, and Hiraan. Weeks of flooding have destroyed physical, productive, and social service delivery infrastructure – with many roads turned into rivers and farmlands fully destroyed. Livestock has been lost and agricultural production has been impacted. In urban centers sewage and flood water have mixed, widely contaminating the shallow wells that provide drinking water making the threat of water-borne diseases, such as cholera, more likely.

The situation has also been exacerbated by the below-average and erratic rains experienced during the 2019 Gu season (April to June) and prior multiple failed planting seasons. According to the Somalia rainfall outlook for Gu 2020, above average rains are forecasted, possibly causing additional flooding along the Juba and Shabelle rivers, potentially exacerbating the devastation caused by the 2019 floods.⁴⁰

The current Desert Locust⁴¹ swarm situation is a critical risk to both pasture and crops and is linked to the recent flooding. The heavy rains and wet soils have supported the uncontrolled development and spread of Desert Locusts across Somalia and provided conducive conditions for breeding. Recent government surveys reveal vast numbers of 'hoppers' as well as mature adults are already present in the flood-affected states of Hirshabelle, Jubaland, as well as South West State, representing the largest swarms facing Somalia in 25 years and posing a significant threat to food security and livelihoods, with the Federal Government of Somalia (FGS) declaring the locust invasion a national emergency on February 2, 2020.

⁴⁰ FAO-SWALIM, [Somalia Outlook for 2020 Gu](#), Feb. 7, 2020.

⁴¹ A species of grasshopper that live largely solitary lives until a combination of conditions promote breeding and lead them to form massive swarms.

Furthermore, systemic problems such as limited investments, infrastructure and regulatory frameworks, as well as climate variability, limit the potential of Somalia's food systems to ensure access to and consumption of nutritious food. As one of the avenues for food production, Somalia's fisheries sector lacks key equipment such as jetties and fishing boats. The lack of research and training opportunities for fishing communities and the absence of a regulatory framework for the industry and serious limitations in the cold chain compound the problem further.

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

With the country's arrears recently cleared in March 2020 in the context of the Heavily Indebted Poor Country Initiative (HIPIC), Somalia is now eligible for international financing in line with the World Bank's re-engagement strategy for the country.

An additional thematic aspect identified is the improvement of food security in Somalia through the agro-pastoral, pastoral, vulnerable farming and fisheries activities. AF may be received from World Bank for this activity which shall be an Additional Component No. 6 of the SCRP.

1.1. Project Development Objective

The Project Development Objective (PDO) is to "support the recovery of livelihoods and infrastructure in flood and drought affected areas and strengthen capacity for disaster preparedness nationwide."

1.2. Project Components

Component 1: Immediate basic services and livelihood support for early recovery to the flood affected states of Hirshabelle, South West, and Jubaland and locust-affected areas nationally through: (a) establishing a cash-for-work scheme for vulnerable households in Flood and/or Drought Affected Areas; (b) controlling the desert locust population through ground and aerial spraying operations and carrying related impact assessment and surveillance activities; (c) restoring and protecting farmers' capacity for agricultural production through the provision of inputs, the pro-positioning of feedstock, the control of vectors and vector-borne livestock disease; (d) revitalizing basic health provisions strengthening response services and referral pathways for survivors of GBV; and (e) supporting household hygiene promotion and treatment.

Component 2: Medium-term flood recovery to rehabilitate of critical public and community infrastructure⁴² in line with build-back-better and climate resilient standards. The component will

⁴²Community infrastructure could include: (a) small-scale community self-built and self-maintained infrastructure; (b) community

rehabilitate water and sanitation systems, broken or non-functioning pre-existing flood control systems (e.g., embankments, drainage, irrigation canals and restoration of river channels through dredging), health facilities, bridges, and small feeder roads. It will also support local mitigation efforts for risk reduction such as slope protection and environmental rehabilitation.

Component 3: Longer-term disaster risk management and preparedness. This component will strengthen the institutional capacity and preparedness of governmental ministries agencies and departments to respond to flood and draught related emergencies through, *inter alia*: (a) piloting integrated flood-drought preparedness and response solutions including community level structural and non-structural interventions; (b) carrying out flood risk management strengthening enabling policy and institutional framework, flood risk assessment and hazard mapping, and pilot for structural flood risk reduction interventions; (c) supporting hydromet and early warning systems for the generation and dissemination of hydromet data; (d) operationalizing the National Drought Recovery and Resilience Framework Secretariat in MoPIED, institutionalizing investment planning processes, aid tracking, inter-institutional coordination and programmatic monitoring and evaluation; (e) establishing the National Emergency Operations Center and developing and rolling out public-civil society collaboration models for crisis response and preparedness; (f) establishing a locusts early warning system; (g) strengthening the Integrated Disease Surveillance and Response System and enhancing laboratory capacity for the timely detection of pathogens (including for COVID-19); and (h) rehabilitating, developing, and equipping selected health facilities for the delivery of essential health services.

Component 4: Project Management. This component will strengthen the institutional capacity Project Implementation Unit (PIU) and State Project Teams for the implementation of the Project, including procurement and financial management activities and audits, preparation of subproject designs and construction supervision, implementation of environmental and social monitoring actions and mitigation measures therefor, quality assurance responsibilities, technical management and oversight, grievance redressal system (including protection from GBV/SEAH and incidents referrals), Project monitoring and evaluation (including independent verification agents [IVA]), and reporting requirements.

Component 5: Contingency Emergency Response Component. This Contingency Emergency Response Component (CERC) is included in the Project in accordance with Investment Project Financing (IPF) Policy, paragraphs 12 and 13. There is a moderate to high probability that during the life of the Project Somalia will experience natural or man-made disasters, and major disease outbreaks of public health importance which causes a major adverse economic and/or social impact, which will result in a request to the Bank to support mitigation, response, and recovery in the areas affected by such an emergency. In the event of such an emergency, the CERC will serve as a first-line financing option for response. Additionally, the CERC is flexible enough to incorporate the new Crisis Response Window Early Response Allocation (CRW ERA) criteria so that it can be mobilized as part of an early response to an eligible food security crisis or disease outbreak.

Component 6: Anticipatory and Recovery Support for Addressing Food Insecurity: This component will include the following two subcomponents:

- Subcomponent 6a: Anticipatory Action and Early Response Support to Food Insecure Communities (US\$ 22.5 million). This will include: (a) Immediate Rehabilitation of Small-Scale Community Irrigation

infrastructure developed, financed, maintained, and operated through non-public means such as NGOs, bilateral funding programs, etc.; and (c) small-scale community infrastructure that may have been created through public financing but was handed over to or fell into community hands for maintenance and upkeep.

and Water Supply Infrastructure, and; (b) Immediate Provision of Fishing Inputs and Infrastructure to Coastal Communities, and related training and awareness. These activities will be undertaken using the 'Inputs for Assets' approach under which agricultural and fishing inputs will be provided to communities in return for their participation in water and fisheries infrastructure. This component will also retain the option of providing agricultural and fishing inputs unconditionally to more vulnerable groups or if otherwise warranted by local circumstances.

- Subcomponent 6b: Medium-term Sustainable Recovery and Resilience of Food Insecure Communities (US\$ 22.5 million equivalent). This will include the rehabilitation and reconstruction of : (a) Larger Drought-Mitigating Water and Irrigation Infrastructure⁴³ ; (b) Fishing Coastal Community Infrastructure and Value Chain Resilience, and; (c) capacity building, training and awareness building of government and communities for recovery planning, scheme design, operation and maintenance and technical oversight for the planned water and fishery infrastructure works, and operation and maintenance under clear ownership and management arrangements. This component will employ routine design and contracting methods while maximizing the use of labor-intensive methods, where applicable.

1.3. Project Context and Target Population

Somalia is in dire need of measures, immediate and long term, to avert the multiple and simultaneous crises afflicting the country, which include drought, floods, conflict, and locust infestations, all happening within the same time and space. As has been highlighted earlier, the resulting effects of this crisis is the visible degradation of humanitarian conditions in the areas heavily affected.

The Project will target the three flood-affected states of Hirshabelle, South West, and Jubaland for recovery interventions, while advancing a national approach to the locust response and longer-term resilience building. The Project's early recovery and locust preparedness activities will likely take six to twelve months to complete, while an overall four-year project duration is proposed: (a) to allow the completion of infrastructure schemes to building-back-better standards; (b) for making the affected communities safer from future hazard risks through structural risk reduction interventions at the community level; and (c) supporting longer-term resilience building measures to support flood risk management. The project will be implemented in areas of fragility due to acute drought, devastating floods and protracted conflict and insecurity which may make direct access to beneficiaries challenging in some cases.

Beneficiary selection will use both geographic and community-based approaches, prioritizing vulnerable groups and drawing on the SCOPE database and UN Inter-Agency Joint Verification Assessment (May 2019, and based on the minimum food expenditure basket).

A database on potential beneficiary targets will be developed to identify targeted beneficiaries in line with centralized project-specific targeting and information management systems. Key beneficiary groups will be affected and vulnerable households (includes labor constrained households, as well as displaced and host communities).

⁴³ This would include existing infrastructure damaged by conflict, natural disasters or infrastructure that may have fallen into disrepair due to neglect and deferred maintenance.

The Project will support people affected by the impacts of floods and drought, as well by locust infestations. This includes around 300,000 households, including a focus on female-headed households, and over 150,000 livestock, as well as rehabilitated assets for over 40 communities. On a ratio of five individuals per household, this amounts to over 1.6 million persons. The most vulnerable populations, farming communities, IDPs, and host communities will be supported through multiple interventions.

Scope of Additional Financing. Following the approval of the AF in June, 2021, it is proposed that the original scope of the project is enhanced to include “anticipatory action” and “immediate response” activities to address the food insecurity crisis, as well as medium term recovery and resilience building activities. To this effect, the new sixth component on “Anticipatory and Recovery Support for Addressing Food Insecurity” will be added to the project. This will entail: (a) immediate livelihoods support through an ‘Inputs for Assets’ approach under which water supply, agricultural and fishing inputs will be provided to communities either unconditionally or in return for their participation in water and fisheries infrastructure, and; (b) strengthening and rehabilitation of existing small to medium scale water and fisheries infrastructure using regular (community) contracting mechanisms while maximizing the use of labor intensive methods. The project will ensure clarity of ownership and management arrangements of all community and local administrations’ assets to be rehabilitated under the Project, to ensure their adequate future operations and maintenance. In addition, given that the food insecurity crisis is spread across the entire country, the scope of the AF will be national, including Somaliland, however appropriate implementation arrangements between the FGS and Somaliland will be discussed prior to implementation of the AF activities.

Beneficiary targets for some selected PDO indicators under the original SCRP Results Framework (RF) are proposed to be revised to reflect the expanded scope of activities and beneficiaries introduced under the Additional Financing. Additional indicators are proposed to be incorporated in the SCRP AF results framework to reflect the AF operations being added to the SCRP. The number of direct overall beneficiaries from the project as a result of the AF would be close to 2 million people, with a few more millions of indirect beneficiaries.

1.4. Environmental and Social Management Framework

This Environmental and Social Management Framework (ESMF) is the environmental and social instrument for assessing, managing and monitoring environmental and social risks and impacts of the Project given that the full nature, scope and geographical locations were not exactly known at the time of preparing the ESMF. The ESMF establishes the screening processes and tools to be directly implemented by all IPs in assessing the risks and impacts of the sub-projects and activities. This will facilitate the recommendation of appropriate mitigation and monitoring measures for each subcomponent and/or activity.

The main purpose of this ESMF is to establish procedures and methodologies for environmental and social assessments, review, approval and implementation of investments to be financed under Components 1-6 of the Project, as the nature, scope and locations of activities become known during the implementation of the Project. A separate Covid-19/CERC ESMF has been prepared to cover activities conducted under Component 5 (CERC). Furthermore, a Pest Management Plan (PMP) has been prepared for Component 1 activities. The PMP has also been prepared as a separate document, it has been approved and disseminated.

The ESMF describes the appropriate roles and responsibilities of the PIU and all IPs and other stakeholders, and outlines the reporting procedures on E&S issues. It describes the managing and monitoring processes of E&S concerns related to the project investments. The ESMF further serves to highlight potential environmental and social risks and impacts and propose ways to avoid, minimize and offset these risks and impacts as well set out ways to increase environmental and social outcomes of the project; and to establish processes, procedures and methodologies for the environmental and social screening of project activities.

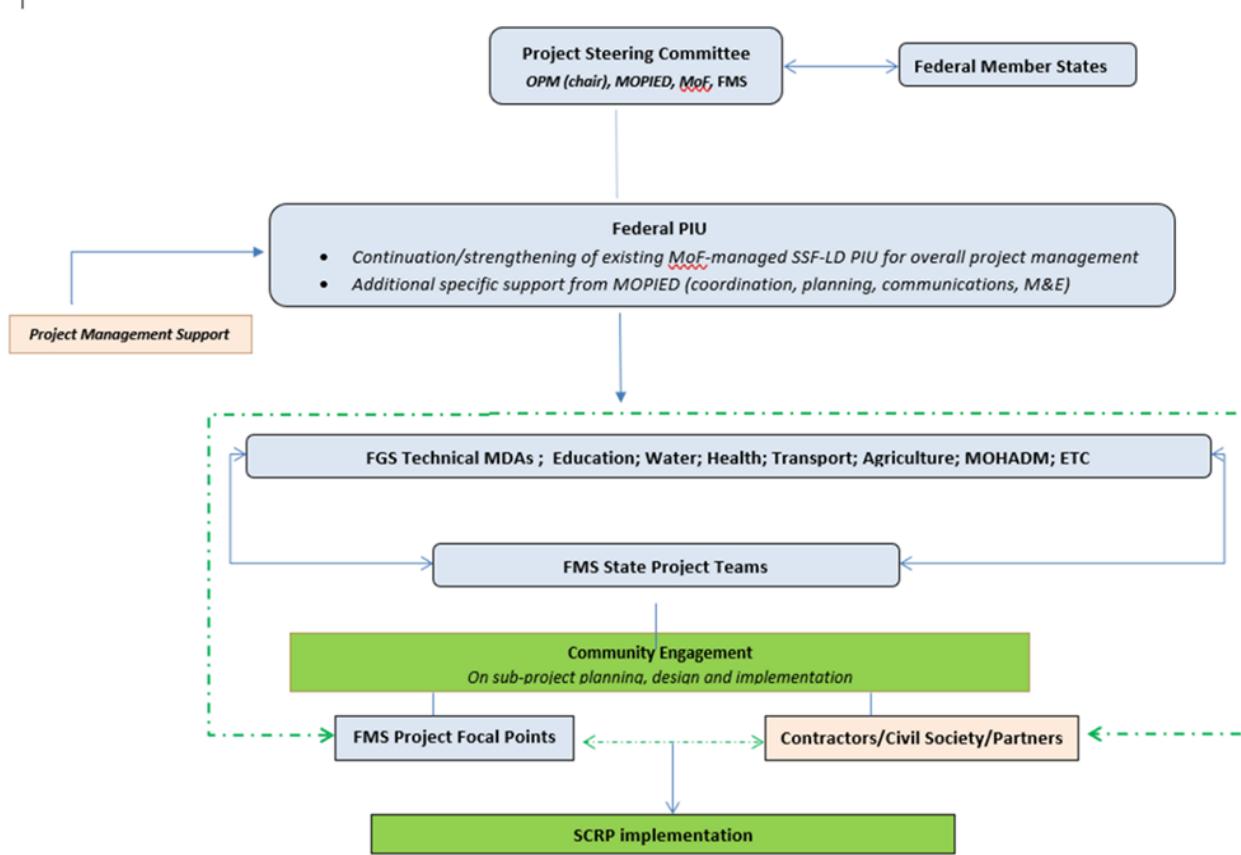
It further determines the training, capacity building and technical assistance required for the PIU and all IPs to successfully implement the provisions of the ESMF and associated instruments.

It also establishes the Project's staffing and institutional arrangements clarifying the relations between the PIU, IPs and the World Bank, including roles and responsibilities in view of the implementation of the ESMF.

1.5. Project Management Structure

The Project builds on existing institutional structures to enhance coordination between Government agencies and state and federal levels and flood-affected communities, with an overarching objective to restore the legitimacy of the State and strengthen State-Citizen trust. The Project will promote coordination and cooperation both vertically and horizontally within Government and with communities. This is considered essential to mitigate any potential destabilizing risks and important to the process of strengthening state-citizen trust. The institutional implementation model - developed in consultation with the FGS and FMS - is seen in the Figure below.

SCRP Institutional Arrangements



At the Federal Level

Project Steering Committee (PSC). The Project will be overseen by a Project Steering Committee chaired by senior staff from the Office of the Prime Minister (OPM), comprised of Director Generals of the Ministry of Finance (MOF), Ministry of Planning and Economic Development (MoPIED), and FMS MoPIED. The PSC will serve as an apex decision-making body responsible for broader strategic oversight, policy guidance, validation of broader resource allocation recommendations by the PIU, and other key decisions referred to it over time. However, the PSC will not be involved in routine operational decision making, such as on project targeting or procurement decisions. The PSC will also approve state investment and procurement plans, conduct periodic implementation progress and compliance reviews, perform trouble shooting functions particularly in the event of disputes, liaise with high level law enforcement agencies to ensure project security, validate strategic course corrections recommended by the PIU and other project constituents, and validate PIU state performance assessments and performance-based allocations to states.

Consultations with high level FMS functionaries and other actors. Another distinct function of the PSC would be to essentially maintain high level working relationships with the Heads of the Project FMS, including periodically consulting state leadership in the conduct of the various functions invested in the PSC as elaborated above. The PSC will also necessarily consult other stakeholders like the relevant UN agencies, development partners, and civil society actors, and take their and FMS feedback on board in the conduct of its core functions.

Project Implementation Unit. The Project PIU will be mapped to the MoF and co-managed and co-staffed by a combination of MoF and MoPIED personnel. It will be responsible for project management, coordination and implementation support to the FMS. These tasks will include quality and process oversight, financial management, procurement, reporting and certification, contract management, M&E, and on ensuring social and environmental safeguards compliance. MoPIED will lead the PIU functions on coordination between Federal and State Government to facilitate prioritization, sequencing, and investment planning and to ensure that different sectoral line agencies work together to implement the multi-sectoral project activities.

For the early recovery activities envisaged under the Project, FMS State Project Team (SPT) and Ministries Departments and Agencies (MDAs) will supervise the work of civil society networks and contractors engaged by the PIU for providing various services, and will monitor compliance with the ESS and local legislation. Further, as determined by Government in consultation with the World Bank, a limited number of UN agencies and civil society organizations will be contracted by the PIU to lead the detailed design and implementation of activities. The CSOs will engage targeted communities to ensure activities properly reflect community needs, while coordinating with relevant FMS MDA and SPT. The PIU will approve technical designs and ensure activity compliance with Federal and state technical standards and with World Bank Environmental and Social Standards (ESS). For subsequent components, the Project intends to build the capacity of SPT to enable them to perform this function, most likely with continued operational support from the contracted INGOs, while the Project will also strive to utilize national capacities wherever possible. Any transfer of responsibilities in regards to ESS monitoring should be approved by the World Bank.

At the State level

FMS MDA. All implementation of medium-term recovery interventions in Component 2 will be delegated to the relevant FMS institutions. FMS MDAs will identify sub-project interventions under the investment plans and prepare subproject designs and bidding documents in consultation with FGS MDAs, as well as support the procurement of contractors. FMS MDAs will also be responsible for contractor and site supervision, technical quality assurance, certification, and payment of works. The Project will finance the operating costs of the respective project teams in these MDAs to ensure that existing capacity and organizational structures are used and enhanced where necessary.

State Project Teams. A State-level extension of the PIU, the SPT is proposed as a “light” structure in each Project state, to be housed in FMS MoPIED, serving primarily as a ‘node of convergence’ at the state level. They are responsible for design review and compliance of proposed designs and supervision of works, consolidating FMS MDA procurement and work plans, and supporting the PIU to manage the FMS Grievance Redress Mechanism (GRM) and project M&E. The SPT will be led by FMS Project “focal points” that will coordinate the participation of relevant technical FMS MDAs. The SPT will review the final procurement plans to assure compliance with World Bank standards, including safeguards, GRM, building-back-better, etc., and consolidation, with onward transmission to the federal PIU for final approval by the PSC. Importantly, the SPT will be responsible for district-level community consultations and raising awareness of the project in their communities through strategic communication.

Citizen Engagement. Project’s implementation will build on strong citizen engagement principles. For Component 1 activities, INGO consortium will be implementing and together they have well-established processes of community engagement, which are both gender and conflict-risk sensitive. The Project as a whole will ensure adequate social mobilization in respect of all project components through the use of

existing community leadership and civil society networks to ensure that communities are consulted at various stages of the subproject cycle, i.e., identification, design, implementation, quality assurance, and impact evaluation. Communities will be facilitated to engage throughout project implementation, including in the monitoring of implementation of project activities. Information boards, local meetings, and other forms of locally appropriate communication tools will be used for community-level information dissemination. A Community Scorecard exercise would be utilized to enable communities to provide formal feedback on overall project governance, including the performance of the targeting and the GRM. These activities are intended to generate evidence to contribute to improving policy and programs to enhance citizen engagement in local service delivery. The key outcome are to promote constructive partnership between citizens and the Government in Somalia. Citizens and community groups will play a critical role in monitoring activities of the Project as determined and agreed by the Government and respective implementing partners. Citizens will help in – validation of needs, assessing awareness of service delivery, expressing satisfaction of service usage and providing feedback on process and output. The Project GRM will be a key vehicle for this aspect of engagement. Evidence generated through multiple avenues of citizen engagement may contribute to better service delivery for current and future interventions. A 360-degree loop of information flow and communication will help strengthen the nexus between implementing partners, citizens and the government.

Implementation Capacity Assessment and Strengthening: The Bank undertook an assessment of FGS and FMS capacities to deliver the Project, which pointed to the need for capacity enhancement at both levels, both for project preparation and implementation. A hybrid strategy was thereby agreed under which the FGS will contract the UNOPS to provide project management surge support during project preparation, and at least during the first two years of implementation, likely on a declining scale—while the Project will also enhance the capacity of the PIU and the SPT where necessary. UNOPS will also provide on-the-job training and skills acquisition to the PIU, SPTs, and the FMS MDAs on procurement, contract management, environmental and social standards, monitoring, evaluation, and reporting, engineering, GBV, grievance redressal, etc. The PIU has designated a focal point on environmental and social standards and has commenced the procurement of dedicated environmental, social, and GBV experts.

Overall

Table 1: Matrix of Responsibilities, including safeguards

PIU	FGS and FMS MDAs	SPT
<ul style="list-style-type: none"> • Coordinating prioritizing and sequencing exercises and investment planning • Quality and process oversight • Procurement of goods and services • Seeking World Bank no-objections • Contract management oversight and controls • Financial reporting • M&E 	<ul style="list-style-type: none"> • Identification of sub-Project interventions under the investment plans • Preparation of subproject designs • Preparation of sub-Project bidding documents • Supervision consultants 	<ul style="list-style-type: none"> • District-level community consultations • Review, compliance and supervision of works • Review procurement plans to assure compliance with World Bank standards

<ul style="list-style-type: none"> • Prepare project compliance reports • Certification of progress reports • safeguards (ESCP) compliance and monitoring including establishing and operating grievance redress mechanism • communications, awareness and outreach, and audits and reporting; 	<ul style="list-style-type: none"> • Site supervision and technical quality assurance • Operations and maintenance • Certification and payment of works 	<ul style="list-style-type: none"> • Provide coordination supports to the MDAs and Implementing Partners • Assist PIU to manage the local grievance redress mechanisms, ensure compliance with the ESCP, the ESSs and applicable safeguard documents; and carry out community outreach, awareness raising and consultations
--	--	---

2. Policy and Legal Framework

2.1. National Regulatory and Policy Framework

In all Somali territories policy and legislation with respect to the environment is nascent or outdated, in terms of assessing the potential impact of such policies on the environment, or how they could contribute to environmental conservation and sustainable livelihood improvement. 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 SCRP, for which this ESMF has been prepared because of the nature of the project.

A number of international agreements and Multilateral Environment Agreements (MEAs) exist, and although binding on Somalia there has been little progress in implementation due to the chronic conflict, the lack of recognition for Somaliland and the applicability in Puntland. Such international environment agreements relate to:

- a) Biodiversity,
- b) Desertification,
- c) Endangered Species,
- d) Law of the Sea,
- e) Ozone Layer Protection and
- f) Marine Dumping.

In recent years Somalia and Somali territories have effected constitutional changes that define natural resources, common environmental goods and ecosystem services as protectable public assets, and ascertain the right to a clean and healthy environment. There are no specific environmental or regulations in place, and many projects and activities still rely on an Environmental and Social Screening Assessment Framework (ESSAF), which has been produced through the Somalia Development Fund (SDF) program.

Protection and use of Somali water resources is the responsibility of the Ministry of Water Resources that has put a policy, act and regulatory framework in place. In Puntland an Environmental Policy was produced in 2014 and framework documents for EIA guidelines and regulations put in place. For all Somali territories the institutions at National, Regional and District Levels are responsible for the implementation and monitoring compliance of both national and international agreements as shown below and include:

- The Minister, in consultation with the Parliamentary Environment Committee and civil society organizations working in the environment shall establish Environmental Watch Councils at National level (NEWC) 2.
- The Min. for Natural Resources (MNR), the Min. for Environment and Rural Development (MoERD) in Somaliland and the Min. for Environment, Wildlife and Tourism (MoEWT) in Puntland with consultation with Regional Authorities, in consultation with civil society, at the Regional level, and communities shall establish the Regional Watch Councils (REWC).
The MNR, MoERD and MoEWT in consultation with the Local Government Councils/ District Governor, local CSO/CBOs and the community shall establish the District Environment and Environment Watch Council (DEWC).

In regards to fisheries, at the federal level, the Ministry of Natural Resources (Fisheries), on May 6, 2013, submitted to the Prime Minister of the Federal Republic of Somalia (FRS) a revised version of Somalia Fishing Law (Law No. 23) of 1985, proposing as a draft bill to the Cabinet of the FRS for discussion and approval. This law requires that all local and foreign fishing vessels are registered and licensed. The FGS and its Member States and Somaliland have in April and May 2014 agreed that a newly established Federal Somali Fishing Authority (FSFA) administer the licensing of foreign fishing vessels for offshore highly migratory stocks in the Somali EEZ.

As a stop gap measure, in the absence of a national regulatory framework for sustainable environment, and other than the pieces of legislation available in some states as discussed above, Somalia has a constitution that contains a number of parameters relevant for various operational activities in the country.⁴⁴

Provisional Constitution of the Federal Republic of Somalia. Somalia passed its Provisional Constitution in 2012. Article 12 of the Constitution addresses public assets and natural resources.

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 15. Prohibits Female Genital Mutilation (FGM).

Art 24. Prohibits sexual abuse in the workplace. The Puntland Sexual Offences Act 2016 prohibits sexual harassment. Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labor offences. Every labor law shall comply with gender equality.

Article 24.5 stipulated that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place

Article 25 states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.

Article 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 so in the public interest, c) any person whose property has been acquired in the name of public interest has the right to just compensation from the State as agreed by the parties or decided by a court.

Article 43 provides guidelines on environmental and social safeguards that can be observed.

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

⁴⁴ SCORE - ESMF

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.

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.

The Labour Code of 1972⁴⁵ stipulates that all contract of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.

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

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

Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.

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

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

The Somali Penal Code of 1962. 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.

⁴⁵ The Code has recently been revised, but the revisions have not yet been passed and signed into law.

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.

Family Code of 1975. Minimum age for marriage 18 for male and females. Females between the age of 16 and 18 can marry with their guardian's consent. Marriage and Divorce. Marriage is based on equal rights and duties. A husband can divorce by repudiation (talaq). Custody of children. The mother retains custody after separation but she loses custody if she remarries.

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

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

The Somalia Fishing Law. The Somaliland Maritime Code of 1959, established before independence, was Somalia's first law to regulate fisheries protection in the country. It prohibited, among other things, "fishing using explosives and lighting fires in areas which are prohibited"⁴⁶. In the years that followed independence in 1960, Somalia has promulgated all national laws, including fisheries laws, and has been party to many international conventions and treaties regarding maritime resources and services. The collapse of the government of General Siad Barre in 1991, however, created a vacuum at the central governance structure of the nation. Thus in the period during and after the civil war, there was no central government to enforce fisheries laws. Therefore, the country's fisheries resources were not protected from local and foreign illegal fishing or other illicit activities.

However, Puntland had its fisheries legislation enacted since 2004⁴⁷. At the federal level, the Ministry of Natural Resources (Fisheries), on May 6, 2013, submitted to the Prime Minister of the Federal Republic of Somalia (FRS) a revised version of Somalia Fishing Law (Law No. 23) of 1985 proposing as a draft bill to the Cabinet of the FRS for discussion and approval. This law requires that all local and foreign fishing vessels are registered and licensed. However, it has not been passed as yet. The FGS and its FMS have in April and May 2014 agreed that a newly established Federal Somali Fishing Authority (FSFA) administer the licensing of foreign fishing vessels for offshore highly migratory stocks in the Somali EEZ.

Currently, the Somali Fisheries Law (Law No. 23 of November 30, 1985) is the principal legislation in Somalia that applies to commercial fishing at sea and inland waters.

Institutional capacity for environmental management

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

⁴⁶ Hassan, 2011

⁴⁷ Mohamed and Herzi, 2005

Most States have Ministries of Environment, which manage environmental issues. The Ministries have passed regulations on Environmental and Social Impact Assessments (ESIAs), which include the licensing of project roads. 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 Ministries are mandated to supervise all matters relating to the environment. They are mandated to review and approve ESIAs and RAPs.

Some States, such as South West State and Jubaland, have Land Authorities, which are responsible for land adjudication matters.

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

2.2. International Conventions Signed and Ratified by Somalia

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

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

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

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

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

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

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

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

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

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

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

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

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

Regional Convention for the Conservation of the Red Sea and the Gulf of Aden Environment (1985) (Jeddah Convention): The Convention aims to conserve integrated ecosystems of the Red Sea, Gulf of Aqaba, Gulf of Suez, Sues Canal to its end on the Mediterranean. Countries signed this convention

undertake appropriate measures to conserve the Red Sea and Gulf of Aden environment, including prevent, abate and combat marine pollution from all sources. Somalia signed the convention in 1982 and ratified it in 1988.

United Nation's Convention on the Law of the Sea (1982) (UNCLOS): This international agreement defines the rights and responsibilities of nations with respect to their use of the world's oceans, establishing guidelines for businesses, the environment, and the management of marine natural resources. Somalia ratified the convention in 1989.

Convention for the protection, Management and Development for the Marine and Coastal Environment of the Eastern African Region (Nairobi Convention): The convention provides a platform for governments, civil society, and the private sector to work together for the sustainable management and use of the marine and coastal environment. The convention was signed by Somalia in 1985, ratified in 1988 and has entered into force in 1996.

2.3. World Bank Environmental and Social Standards (ESS)

The Environmental and Social Framework (ESF) sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity. The short summary of several relevant Environmental and Social Standards (ESSs) from the latest Banks' Environmental and Social Framework are presented below.

The Environmental and Social Standards set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens.

The standards will:

- (a) support Borrowers/Clients in achieving good international practice relating to environmental and social sustainability;
- (b) assist Borrowers/Clients in fulfilling their national and international environmental and social obligations;
- (c) enhance nondiscrimination, transparency, participation, accountability and governance;
- (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement

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

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

The environmental and social assessment will be based on current information, including a description and delineation of the project and any associated aspects, and environmental and social baseline data at an appropriate level of detail sufficient to inform characterization and identification of risks and impacts and mitigation measures. The assessment will evaluate the project's potential environmental and social risks and impacts, with a particular attention to those that may fall disproportionately on disadvantaged and/or vulnerable social groups; 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. The environmental and social assessment will include stakeholder engagement as an integral part of the assessment, in accordance with ESS10.

According to ESS1 the Client will manage environmental and social risks and impacts of the project throughout the project life cycle in a systematic manner, proportionate to the nature and scale of the project and the potential risks and impacts. The Client is thereby responsible to cascade compliance with standards along the chain of implementing partners, contractors, and subcontractors.

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

The Borrower will develop and implement written labor management procedures applicable to the project, making reference to the mitigation measures relating to OHS as well. These procedures will set out the way in which project workers will be protected and 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 in accordance with ESS2. ESS2 requires also a grievance redress system which allows workers to raise their grievances.

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

The ESMF should include sections on resource efficiency and pollution prevention and management. Assessment of risks and impacts and proposed mitigation measures related to relevant requirements of ESS3, including raw materials, water use, air pollution, solid waste generation, disposal of large amounts of excavated materials, hazardous materials, hazardous waste, erosion and sedimentation of rivers from earthworks and run-offs during construction work are included within scope of the ESMF, and ESMPs as relevant.

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

Key risks and impacts for community health and safety relate to GBV/SEA-H, pollution and security. Consistent with this, ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. Community Impacts associated with a project might include accidents due to the movement of vehicles or traffic disturbance, dust and noise emissions, and generation of wastes. The project will adopt site-specific mitigation measures on a case by case basis for each subproject depending on its scale, location, and surrounding receptor

While not explicitly mentioned, prevention and mitigation of different forms of gender-based violence, specifically Sexual Exploitation and Abuse, is being covered by ESS4.

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

Experience and research indicate that physical and economic displacement, if unmitigated, may give rise to severe economic, social and environmental risks: production systems may be dismantled; people face impoverishment if their productive resources or other income sources are lost; people may be relocated to environments where their productive skills are less applicable and the competition for resources greater; community institutions and social networks may be weakened; kin groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help maybe diminished or lost. For these reasons, involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

The ESS does not apply to voluntary land transactions, as will be relevant for the SCRP. Voluntary, legally recorded market transactions are those in which the seller has the opportunity to retain the land, and to refuse to sell it, and is fully informed about his options. Such voluntary transactions, however, cannot result in the displacement of persons as a result of the transaction.

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

of ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can therefore often adversely affect the delivery of ecosystem services.

ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. Habitat is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the nonliving environment. All habitats support complexities of living organisms and vary in terms of species diversity, abundance and importance.

This ESS also addresses sustainable management of primary production and harvesting of living natural resources. Where the Environmental and Social Impact Assessment has identified potential risks and impacts on biodiversity or habitats, the Borrower will manage those risks and impacts in accordance with the mitigation hierarchy and GIIP

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

The requirements of ESS8 apply to cultural heritage regardless of whether or not it has been legally protected or previously identified or disturbed. The requirements of ESS8 apply to intangible cultural heritage only if a physical component of a project will have a material impact on such cultural heritage or if a project intends to use such cultural heritage for commercial purposes.

The Borrower will implement globally recognized practices for field-based study, documentation and protection of cultural heritage in connection with the project, including by contractors and other third parties.

A chance finds procedure is a project-specific procedure which will be followed if previously unknown cultural heritage is encountered during project activities. It will be included in all contracts relating to construction of the project, including excavations, demolition, movement of earth, flooding or other changes in the physical environment. The chance finds procedure will set out how chance finds associated with the project will be managed.

The procedure will include a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence-off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions consistent with the requirements of this ESS and national law; and to train project personnel and project workers on chance find procedures.

ESS 10 – Stakeholder Engagement and Information Disclosure. This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental

and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The client will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.

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. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

In consultation with the Bank, the Borrower will develop and implement a Stakeholder Engagement Framework (SEF) proportionate to the nature and scale of the project and its potential risks and impacts. The SEF also outlines the establishment of a functioning grievance redress mechanism. Furthermore, the Project will apply the World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines.⁴⁸

In consideration of Covid-19 restrictions or for communities affected by floods, locust, the project has followed World Bank guidelines on community consultation under COVID-19. This means effective and meaningful consultations to meet project and stakeholder needs and adhere to the restrictions put in place by the government to contain virus spread. While COVID-19 restrictions are still in place, strategies will be employed to include smaller meetings, small FGDs to be conducted as appropriate taking full precautions on staff and community safety. Where meetings are not permitted, traditional channels of communications such as radios and public announcements should be implemented. Other strategies include the one on one interviews through phones and skype for community representatives, CSOs and other interests' groups.

⁴⁸ World Bank Group, Environmental, Health, and Safety General Guidelines, April 30, 2007, accessed at: <https://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final%2B-General%2BEHS%2BGuidelines.pdf?MOD=AJPERES>

2.4. Legal Gap Analysis

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

GAP Analysis World Bank ESS and National Legal Framework			
ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts			
<p>Objectives of ESS 1 are:</p> <p>To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs.</p> <p>To adopt a mitigation hierarchy approach to:</p> <ul style="list-style-type: none"> (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigated; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible. <p>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.</p> <p>To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate.</p>	<p>Provisional Constitution of the Federal Republic of Somalia. Article 12 of the Constitution addresses public assets and natural resources.</p> <p>Article 43 provides guidelines on environmental and social safeguards that can be observed.</p>	<p>Laws have not been developed yet</p> <p>ESIAs not incorporated in federal law yet, and not strong in State-level legislation</p>	<p>This ESMF lays out a screening process of all sub projects and activities in order to assess whether activities require environmental and social assessments</p>

To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.			
ESS 2: Labor and Working Conditions			
The Objectives of ESS 2 are: To promote safety and health at work. To promote the fair treatment, non-discrimination and equal opportunity of project workers. To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. To prevent the use of all forms of forced labor and child labor. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. To provide project workers with accessible means to raise workplace concerns.	<p><u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose.</p> <p>Article 24.5 stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place</p> <p>The Puntland Sexual Offences Act 2016 prohibits sexual harassment.</p> <p>Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labour offences. Every labour law shall comply with gender equality. Dismissal for pregnancy. All women have a special right of protection from discrimination.</p> <p><u>The Labour Code of 1972</u> stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.</p>	<p>The new labor code, amending the code from 1972, has not been passed yet. The implementation of the existing articles in practice may not be very strong</p> <p>A decree in Somaliland and legislation in Puntland prohibiting FGM have been drafted.</p>	<p>The Project will not allow any forced and child labor. It will hold all contractors liable to the implementation of the LMP. The PIU will have overall responsibility to monitor the implementation of the LMP</p> <p>The LMP spells out a workers' grievance redress mechanism; and the GBV Action Plan provides referral pathways for cases of GBV (see annex 4)</p>
		n/a	The Project will fully comply with WB ESS 2. This is set out in the LMP (see annex 6)

	<p><u>The Labour Code of 1972.</u> 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</p>	n/a	The Project will apply occupational health and safety management system that is consistent with the WBG General Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety
	<p><u>The Labour Code of 1972.</u> Workers have the right to submit complaints and the employer must give the complaints due consideration.</p>	n/a	The LMP sets out a workers' grievance redress mechanism
	<p><u>The Labour Code of 1972.</u> Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.</p>	<p>Women are restricted from being employed in night work, and the specific types of work prohibited for women may be prescribed by decree.</p> <p>No provisions on the protection of the rights of domestic workers</p>	The Project will fully comply with the national law and WB ESS 2. This is set out in the LMP (see annex 6)
	<p><u>The Labour Code of 1972.</u> 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.</p>	n/a	The Project will only allow deployment from the age of 15 (see LMP).However, children under 18 are not to be considered for hazardous work and the work cannot interfere with their education or be harmful for their health.
	<p><u>The Labour Code of 1972.</u> The Labor Code forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children.</p>	<p>Children are deployed in worst forms of child labor (forced recruitment by army, forced labor in domestic work, agriculture and herding, breaking rocks for gravel, construction work,</p>	The Project will only allow deployment – in all project worker categories – from the age of 18 (see LMP). Rigorous monitoring will ensure the application of the LMP.

	<p><u>The Labour Code of 1972.</u> 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.</p>	<p>commercial sexual exploitations)</p> <p>However, Somalia made efforts to construct a rehabilitation center for former child combatants and establish a Human Trafficking and Smuggling Task Force.</p> <p>Children are further deployed in agriculture (farming, herding livestock, fishing); industry (construction, mining and quarrying); services (street work, working as maids in hotels, domestic work, voluntary recruitment of children by army); children also perform dangerous tasks in street work</p> <p>Laws do not identify hazardous occupations or activities prohibited for children, and child trafficking for labor and commercial sexual exploitation is not criminally prohibited.</p> <p>Government does not employ labor inspectors and conducts no inspections.</p>	<p>n/a</p> <p>The project will follow national law and ESS 2.</p>

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

	environmental degradation, and to conserve the environment and prevent activities that damage the natural resources and the environment of the nation, among other measures.		
ESS 4: Community Health and Safety			
<p>The Objectives of ESS 4 are:</p> <p>To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances.</p> <p>To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.</p> <p>To have in place effective measures to address emergency events.</p> <p>To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</p> <p>To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams</p>	<p><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 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.</p> <p>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</p>	<p>The Somali Penal Code of 1962 fails to protect survivors and prosecute perpetrators. The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and gender based violence</p> <p>Furthermore, in practice however it has been documented that women complaining about a rape may find themselves trapped by the Article 426 prohibition against adultery that makes no exception for the case of rape.</p> <p>In practice provisions under Art 39(i) offer little more than theoretical protection</p> <p>Domestic violence: Somalia does not have a law that specifically addresses domestic violence.</p> <p>Marital rape: It is not specifically criminalized. Women owe a duty of obedience to their husbands and are expected to fulfill</p>	<p>Although the Project aims to improve the lives of previously affected communities, it needs to be ensured that Project activities do not pose any unintended negative consequences on communities, for example through increased GBV incidents. A GBV/SEAH Child Protection Prevention and Response Plan will be prepared, consulted upon, approved and implemented. The Project will also implement a Security Management Plan, and activity-specific ESMPS as required for other community health and safety risks.</p>

		<p>conjugal duties in the marriage.</p> <p>Abortion for rape survivors: Art. 418-422 Abortion, with or without consent and for honor, including for women who have been raped is prohibited.</p> <p>Art. 426. Adultery is an offence.</p> <p>Art. 409. Homosexual conduct between consenting adults is criminalized.</p> <p>Honor crimes: Mitigation of penalty for a person who kills a female relative in the sudden heat of rage after finding her in a sexual act.</p> <p>Art. 405-408. Prostitution is prohibited.</p> <p>Human trafficking: No comprehensive law on the issue.</p>	
	<p>Penal Code of 1975 Minimum age for marriage 18 for male and females. Females between the age of 16 and 18 can marry with their guardian's consent.</p> <p>Marriage and Divorce. Marriage is based on equal rights and duties. A husband can divorce by repudiation (talaq).</p> <p>Custody of children. The mother retains custody after separation but she loses custody if she remarries.</p>	<p>Sharia and customary laws are used to address family matters. Lack of legal protections from early and force marriage.</p> <p>Sharia rules apply to marriage and divorce.</p> <p>Poligamy is allowed in limited specific circumstances but family Code is seldom applied.</p> <p>Inheritance: Women have a right to inheritance, but in</p>	n/a

		many cases receive less than men. Fathers are the guardians of children.	
	Somalia's National Gender Policy (2016) includes strategies to eradicate harmful traditional practices such as FGM/C and child marriage and to improve services for the management of GBV cases.	n/a	This is taken up in the GBV Action Plan
	n/a	n/a	Several measures will be undertaken, including contractors will develop road safety management plan and a Health and Safety Plan as part of the CESMP to address the impacts on local communities of moving construction equipment; measures and actions developed to assess and manage specific risks and impacts outlined in the ESMF and subsequent ESMPs.

ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

<p>The Objectives of ESS 5 are:</p> <p>To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.</p> <p>To avoid forced eviction.</p> <p>To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by providing timely compensation for loss of assets at replacement</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 26 states that every person has the right to own, use, enjoy, sell and transfer property. The State may compulsorily acquire property only if doing so is in the public interest. Any person whose property has been acquired in the name of the public interest has the right to just compensation from the State as agreed by the parties or decided by a court. Compensation is provided only for occupants of temporary structures. Affected persons are to be settled in suitable land and their eviction and settlement costs be paid for by the local government.</p> <p>Provisional Constitutions of Somalia (Article 43) call for consultation between the Mayor and the Planning Committee prior to the expropriation of private land</p> <p>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.</p>	<p>There is a lack of detailed legislation governing land use and ownership</p> <p>Evictions are reported to be common place in Somalia</p> <p>ESS 5 recognizes three categories of Project Affected Persons, which are eligible for compensation:</p> <ol style="list-style-type: none"> 1. Those with formal legal rights to land (including customary and traditional rights recognized under the laws of the country) 2. Those who do not have formal legal rights to land at the time of census, but have a claim that is recognized under the laws of the country 3. Those who have no recognizable legal right or claim to the land they are occupying. <p>Those without legal title to land, including squatters and encroachers, are eligible for only limited protection under Somali laws and policies</p> <p>ESS 5 further defines types of losses to be compensated to include physical and economic displacements and cover land, residential or commercial structures, and lost income caused by</p>	<p>Where land is donated by private owners, a land donation agreement process is implemented.</p> <p>A Resettlement Policy Framework (RPF) will guide the development of site-specific RAPs once the project footprint is known. (see annex 3). The RPF follows ESS 5 guidelines.</p>
---	---	--	---

	<p>temporary or permanent economic displacement</p> <p>While under Article 26, people have a right to be compensated, it is not clear how the amount for the compensation is determined. ESS 5 requires full replacement costs for all assets.</p> <p>Somali law does not determine compensation schedule and cut-off date.</p> <p>ESS 5 determines that improvements of the living situations of displaced vulnerable people should be undertaken, Somali Law does not provide for that.</p> <p>No meaningful consultations with project affected persons may take place, consultation mechanisms seem to make a preference in regards to governmental bodies rather than community stakeholders. The Agricultural Land Law led to disparities between statutory tenure and actual land use and allocation.</p>	
--	--	--

ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
<p>The Objectives of ESS 6 are:</p> <p>To protect and conserve biodiversity and habitats.</p> <p>To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity.</p> <p>To promote the sustainable management of living natural resources.</p> <p>To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 25 of the Constitution states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.</p> <p><u>Provisional Constitution of the Federal Republic of Somalia</u>. 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.</p> <p>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.</p> <p><u>The Fishery Law (1985)</u>. Applies to commercial fishing at sea and inland waters.</p>	<p>No detailed laws govern biodiversity conservation and sustainable management of living natural resources at this point.</p>	<p>The Project will avoid any encroachment into any modified, natural, critical habitat and/or protected areas</p>
ESS 8: Cultural Heritage			
The Objectives of ESS 8 are:	n/a	n/a	The Project will implement chance find procedures to

<p>To protect cultural heritage from the adverse impacts of project activities and support its preservation.</p> <p>To address cultural heritage as an integral aspect of sustainable development.</p> <p>To promote meaningful consultation with stakeholders regarding cultural heritage.</p> <p>To promote the equitable sharing of benefits from the use of cultural heritage.</p>			<p>protect cultural or archeological findings during project activities, as per Chance Find Procedure in annex2.</p> <p>The Project will further conduct community consultations (as per SEP) prior to project activities in order to ensure protection of other tangible and intangible cultural heritage</p>
ESS 10: Stakeholder Engagement and Information Disclosure			
<p>The Objectives of ESS 10 are:</p> <p>To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.</p> <p>To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.</p> <p>To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.</p> <p>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.</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 32 stipulated that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information</p>	<p>The law on the right of access to information currently only exists as a draft</p>	<p>The Project will implement stakeholder consultations throughout the lifetime of the project, as per the SEP</p> <p>The PIU will ensure that a grievance mechanism for the project is in place, in accordance with ESS 10 as early as possible in project development to address concerns from project affected persons</p>

To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.			
---	--	--	--

3. Environmental and Socio-Economic Baseline

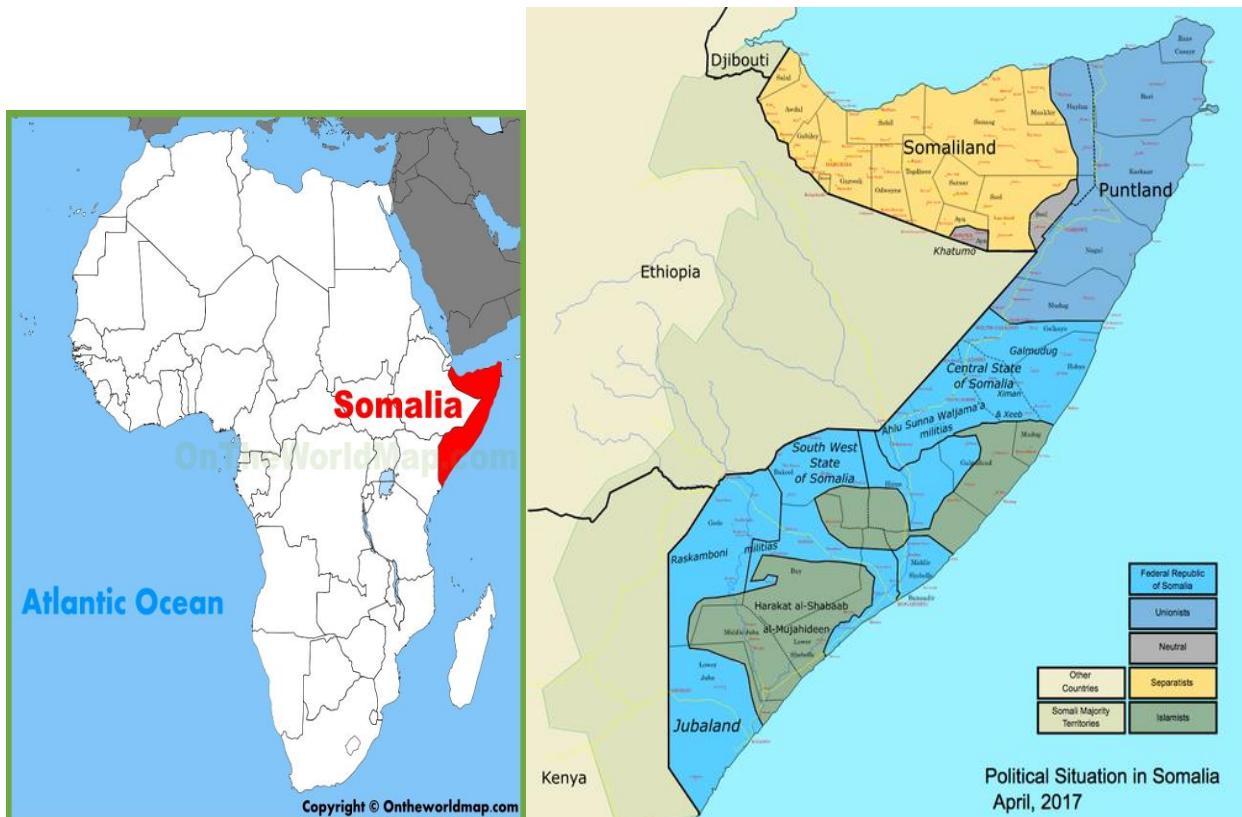
3.1. Environmental Baseline

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. Geography and Climate

Geography:

Somalia is Africa's easternmost country, and is bordered by Kenya to the south, Ethiopia to the west, Djibouti to the north-west, the Gulf of Aden to the north, and the Indian Ocean to the east. It has a land area of 637,540 km², and a coastline of 3,300 km, the longest of any African country, 1,300 km of which is on the Gulf of Aden and the other 2,000 km on the Indian Ocean. The country stretches for almost 1,550 km from north to south between latitudes 12°00'N and 1°37'S, and 1,095 km from west to east between longitudes 41°00' and 51°21'E⁴⁹. The map below shows location of Somalia in relation to the neighboring countries.

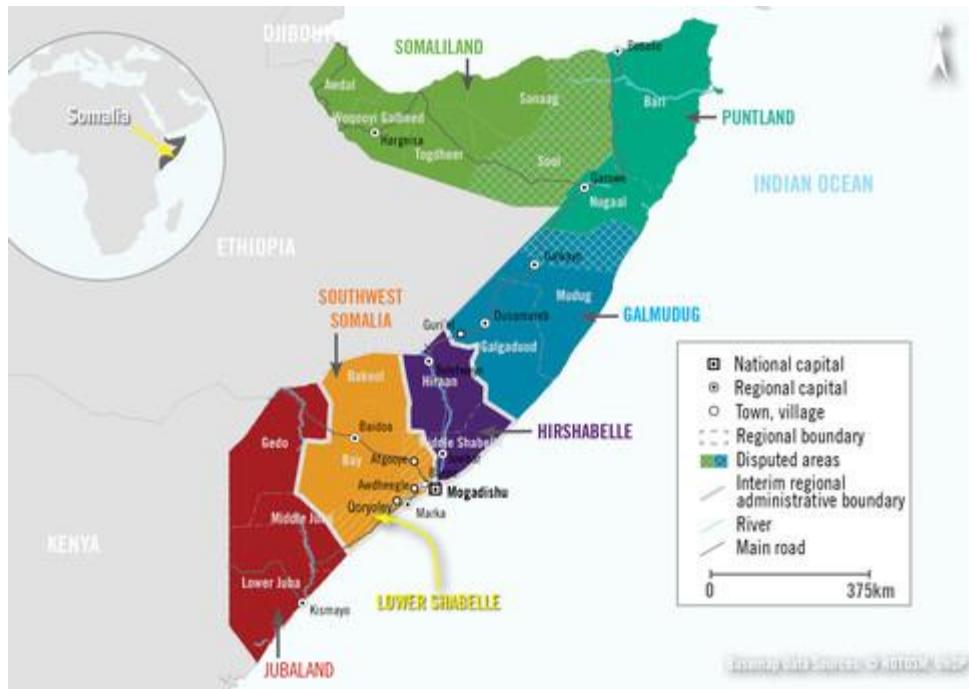


Somalia location on Africa Map and Map of Somalia

Source: <https://www.google.com/search?q=Somalia+Atlas+Map>

⁴⁹ UNEP 2005.

Of interest are the three Somalia States located mostly in the south and south east of Somalia, as shown in the map below;



Map of Somalia showing geological locations of the 3 states

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

Hirshabelle State is located in south central Somalia. It is bordered by Galmudug to the north, Koofur Orsi and Banadir region to the south, Ethiopia to the west and the Somali Sea to the east. Jowhar is the capital city of Hirshabelle.

The **South West State of Somalia**, known locally as Koofur Orsi, is bordered to the south by Jubaland, to the north by Hirshabelle, to the west by Ogadenia, and to the east by the Somali Sea.

Jubaland is in southern Somalia. Its eastern border lies 40–60 km east of the Jubba River, stretching from Gedo to the Indian Ocean, while its western side flanks the North Eastern Province in Kenya, which was carved out of Jubaland during the colonial period⁵⁰

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 or so 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.

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

⁵⁰Osman, Mohamed Amin AH, *Somalia, proposals for the future*, 1993, SPM. pp. 1–10.

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, 50-150mm 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) cycle⁵¹. Different ENSO phases have diverse impacts during seasons and across different parts of the Horn⁵².

In **South West State**, the 2018 Deyr season was well below average and during the 2019 Gu season, all areas in the state received varying levels of rains. The coastal line of Lower Shabelle, and many parts of Bay and Bakool (Baidoa, Buurhakaba, Tieglow, Waajid and Rabdhure) received poor rains. The rest received below average rains. There are pockets in Wanlawey, Sablaale, Afgooye, Qansax Dheere, Diinsoor Xudur and Ceel Barde that received near average rains. But overall, the rainfall performance in the entire South West State was below average to poor⁵³.

In **Hirshabelle State**, there was poor 2018 Deyr and the abnormally hot 2019 Jilaal seasons. Additionally, the rains were too late for late planted crops to perform well, and the livestock need more seasons to recover and breed.

In **Jubaland State**, however, there was light to moderate rains were received in parts of Juba and Gedo regions. The figures below show rainfall pattern in 2016, which has followed the same pattern with what was obtained in the subsequent years.

3.1.2. Climate Change

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 storms⁵⁴. 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 stakeholders⁵⁵.

⁵¹Williams and Funk 2011, pp. 2417–35.

⁵²Anyah, and Semazzi, 2006, pp. 39–62.

⁵³ Somalia Drought Impact Response Plan, 2019, accessed at: <https://reliefweb.int/report/somalia/somalia-2019-drought-impact-response-plan-dirp>

⁵⁴Ministry of National Resources 2013, p. 14.

⁵⁵Somalia Country Economic Memorandum 2018.

Somalia has had a fair share of extreme weather events for the past 25 years⁵⁶. The three states under discussion are heavily affected, with this type of weather, threatening food security in the respective areas.

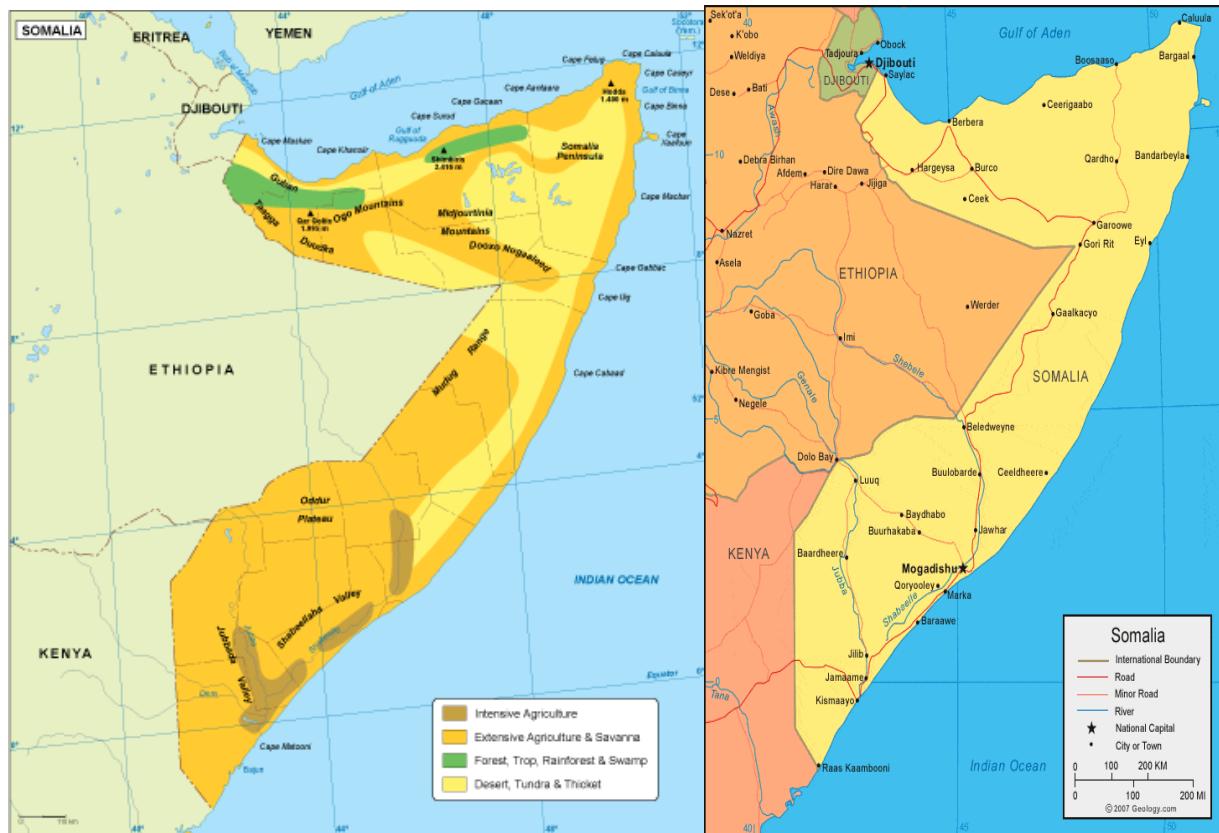
The **South West State** is historically the epicentre of previous episodes of famine and severe drought. Baidoa is the regional hub for humanitarian partners operating in Bay and Bakool regions. During the 2019 Gu season, all areas in the state received varying levels of rains. The coastal line of Lower Shabelle, and many parts of Bay and Bakool (Baidoa, Buurhakaba, Tieglow, Waajid and Rabdhure) received poor rains. The rest received below average rains. The rainfall deficit has huge negative impact on crop production. The rainfall performance was relatively better in pastoral livelihoods zones of the state than agro pastoral areas. There is pasture regeneration and recharge of water points. However, the situation is expected to rapidly change from July onwards when the limited available resources (pasture & water) begin to decline. The general crop production prospect is estimated to be below average to poor depending on rainfall variation⁵³, threatening food security in the state and largely affecting the entire country.

In **Hirshabelle State**, although Gu' season rains commenced late in May 2019, and have reportedly filled water catchments and berkeds and expected to improve water and pasture conditions, it is not expected to improve the overall food insecurity situation immediately. Because the rains were too late for late planted crops to perform well and the livestock need more seasons to recover and breed. Pastoralist in the locations that received little or no rains have moved to areas with better access to water. The riverine communities planted late crops taking advantage of the river water to irrigate their crops. However, the affected people need support to fully recover from the effects of the drought⁵³.

In **Jubaland State**, during the period of light rains, there was observed cross border migration of pastoralists with their livestock from Kenya in to Lower Juba and from Drought Impact Response Plan 2019 15 Gedo in to Ethiopia and parts of Middle and Lower Juba in search of pasture. It is anticipated this will lead to overgrazing, possible conflict over the resources and cross infection of animal diseases from different regions as well as pressure on other existing assets including water pans and health services.

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

⁵⁶Food and Agriculture Organization of the United Nations (FAO) 2018.



Map showing intensive agriculture and transport system in the southern region
 Source: <https://geology.com/world/somalia-satellite-image.shtml>

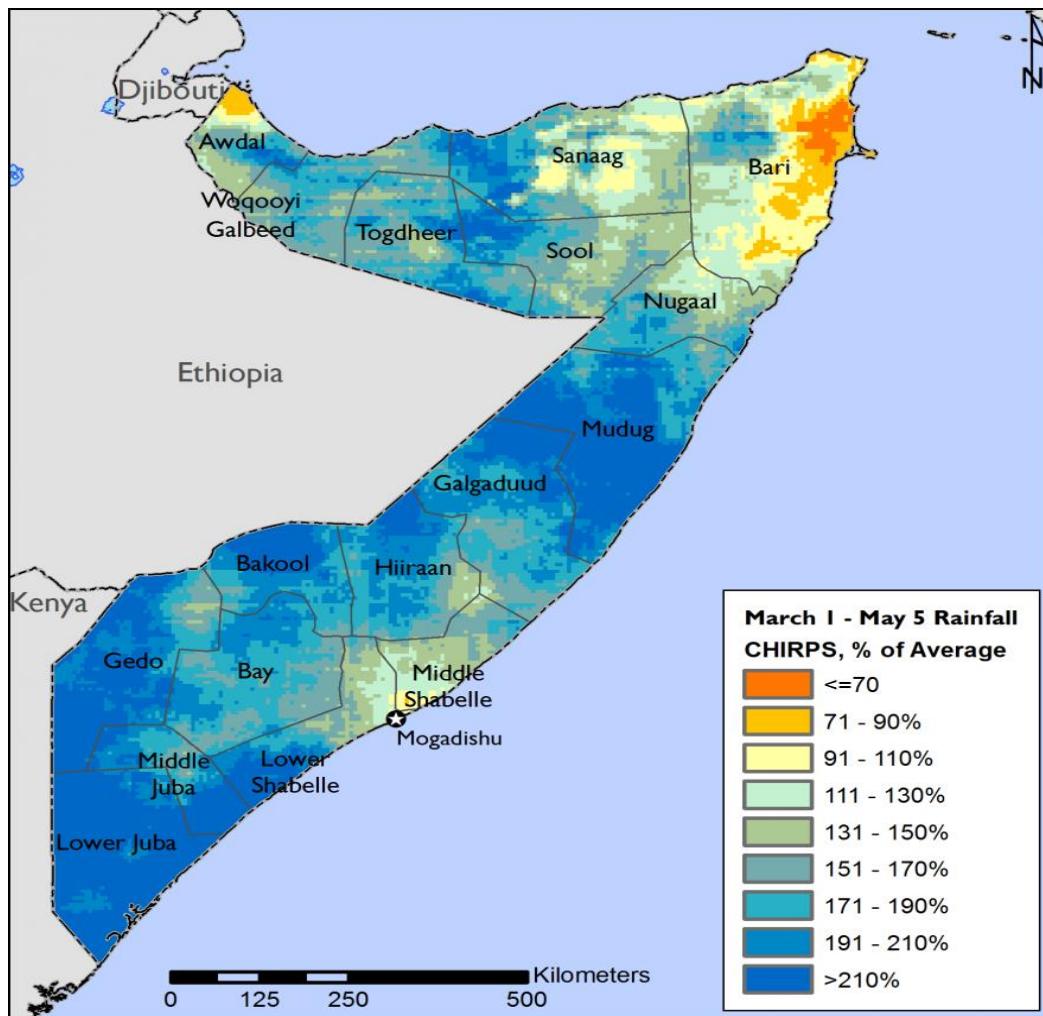
3.1.3. Disaster Vulnerability (flood, locusts)

Somalia has been ranked as one of the most vulnerable countries and least prepared to deal with the effects of climate change. Rainfall totals during the first half of the April to June *Gu* season are some of the highest on the 1981-2017 record, equivalent to between 130 and over 200 percent of average (Figure 8). The heavy rainfall marks the end of prolonged drought across much of the country and is supporting crop development and the regeneration of pasture and water resources. However, the heavy rainfall and subsequent flooding has also led to fatalities, massive displacement, and damage to infrastructure and cropland. Needs are expected to increase in displacement sites and riverine areas in the near term.

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

In riverine areas of the Juba River, floods inundated an estimated 10,250 hectares (ha) of crops and an additional 18,000 ha of cultivable land in Gedo, Lower Juba, and Middle Juba. Along the Shabelle River in Wanlawayne and Qoryole, floods destroyed an estimated 30,000 ha of cultivable land, 4,000 ha of which had been cropped. Of greatest concern is Hiraan, where flooding displaced approximately 180,000

people, including 22,500 households in Beletweyne town, and destroyed crops, stored commodities, and transportation infrastructure. It was estimated that over 70 percent of farms in riverine areas of Hiraan were inundated⁵⁷.



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

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

Desert Locusts

Desert Locust are always present somewhere in the deserts between Mauritania and India. If good rains fall and green vegetation develop, Desert Locust can rapidly increase in number and within a month or two, start to concentrate, gregarize which, unless checked, can lead to the formation of small groups or bands of wingless hoppers and small groups or swarms winged adults causing an outbreak. If an outbreak or contemporaneous outbreaks are not controlled and if widespread or unusually heavy rains fall in adjacent areas, several successive seasons of breeding can occur that causes further hopper band and adult swarm formation, causing an UPSURGE and generally affects an entire region.

⁵⁷ Famine Early Warning System Network (FEWS), Heavy Gu Rainfall leads to heavy flooding, May 11, 2018, accessed at: <https://fews.net/east-africa/somalia/alert/may-2018>

If an upsurge is not controlled and ecological conditions remain favorable for breeding, locust populations continue to increase in number and size, and the majority of the infestations occur as bands and swarms, then a PLAGUE can develop. A major plague exists when two or more regions are affected simultaneously⁵⁸.

The desert locust upsurge first spread to northern Somalia in mid- to late 2019, facilitated by above-average October to December Deyr rainfall and cyclone Pawan⁵⁹. Predictions by FAO, are that rainfall forecasts for the Gu' 2020 period indicate a strong possibility of average to above-average precipitation in most parts of Somalia. These Gu' rains are expected to maintain rangelands and support planting activities. However, they could enable a new wave of breeding and further spread of the locust pests. Pasture losses are expected in areas where swarms land, although rainfall in coming months is likely to partially continue offsetting the impact. Nonetheless, if the desert locusts continue to multiply, pasture regeneration will not be able to keep pace⁶⁰.

Therefore, despite localized and limited negative impacts on food security to date, new desert locust swarms do pose a significant risk of food insecurity in northern Somalia and in south-central areas on the border with Ethiopia and northeastern Kenya. In addition, there is a high likelihood of river floods due to a forecast of above-average rainfall in the south during the April to June *Gu* season, an occurrence which also threatens the availability of locusts. Crop losses from desert locust and river floods are expected to result in a *Gu* cereal production deficit of 15-25 percent. Although favorable *Gu* rainfall will likely mitigate pasture loss from April to June, below-normal pasture availability is expected in locust-affected areas throughout the July to September *Xagaa* dry season, which is expected to lead to atypical livestock migration and a decline in livestock productivity⁵⁹.

3.1.4. Biological Environment

Somalia's natural resources fall into three broad 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.*) and myrrh (from *Commiphora spp.*, both *Burseraceae*), as well as surface water; and sub-surface resources such as rocks and minerals, fossil fuels, and groundwater. Many of them have been directly or indirectly impacted by the extended civil conflict, but competition for access to some resources has also been, and continues to be, a source of conflict in itself.

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.

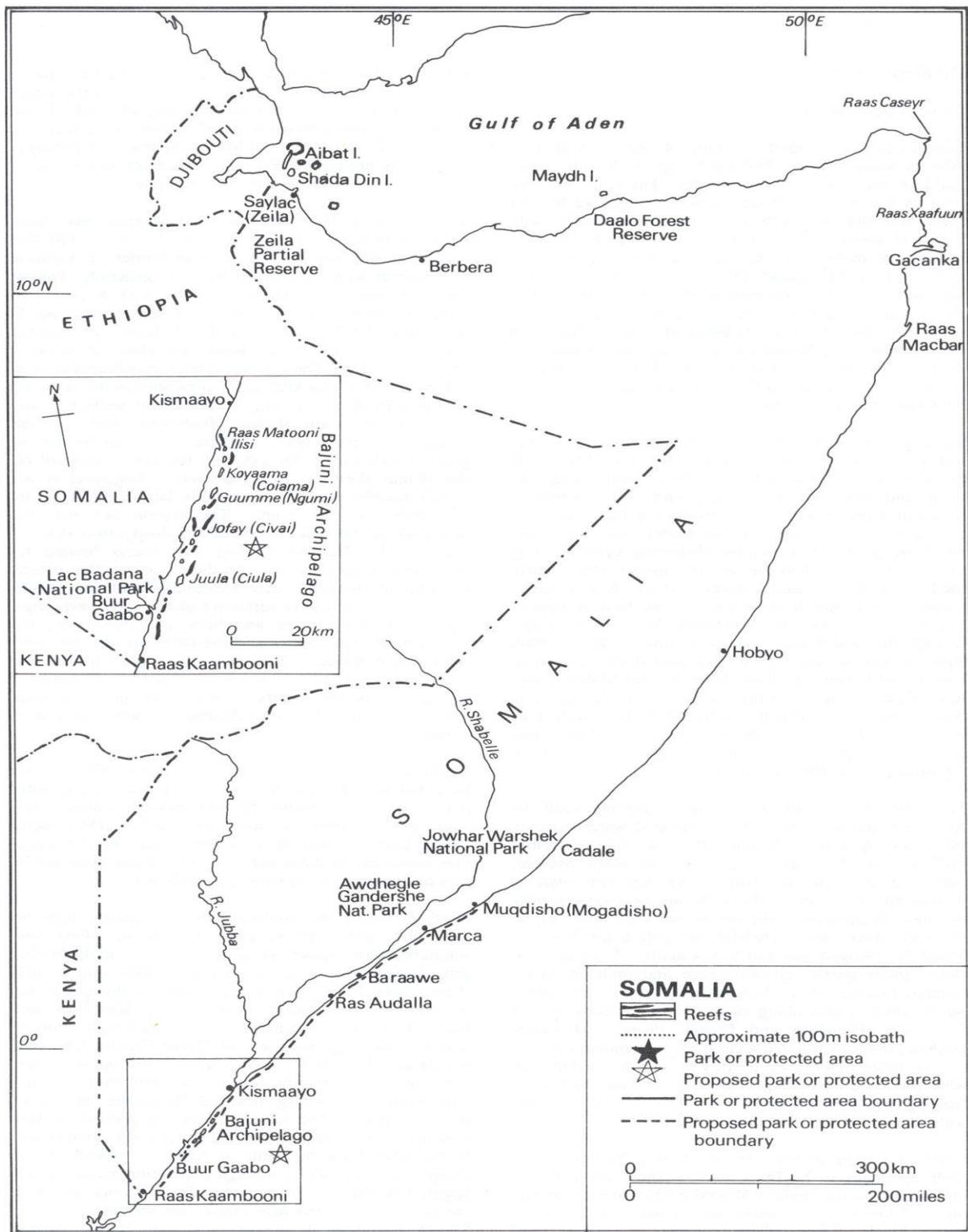
Biodiversity and Protected Areas: Only 0.8% of the Somalis area is under some form of protection (2000). A National Conservation Strategy used to exist, but is now extremely low on the territories' agenda. Somalia is part of Conservation International's Horn of Africa Hotspot which has over 60 endemic 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 important to

⁵⁸ FAO 2018

⁵⁹ FEWS Net, Desert locust and Floods pose a Risk of Crisis (IPC Phase 3) outcomes in more areas by mid-20, accessed at: <https://fews.net/east-africa/somalia/food-security-outlook/february-2020>

⁶⁰ Humanitarian Bulletin SOMALIA, 2020

address, although *Prosopis* could be used to substitute endemic trees for charcoal production Error! Bookmark not defined.



Map showing Somalia's ecological parks, coral reefs and protected areas.

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

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 km²) of the land^{Error! Bookmark not defined.}.

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 2014⁶¹. Even with current temperatures, the flora in Somalia is strained to such an extent that it is often unable to rehabilitate itself⁶².

3.1.5. Water Resources (Hydrology)

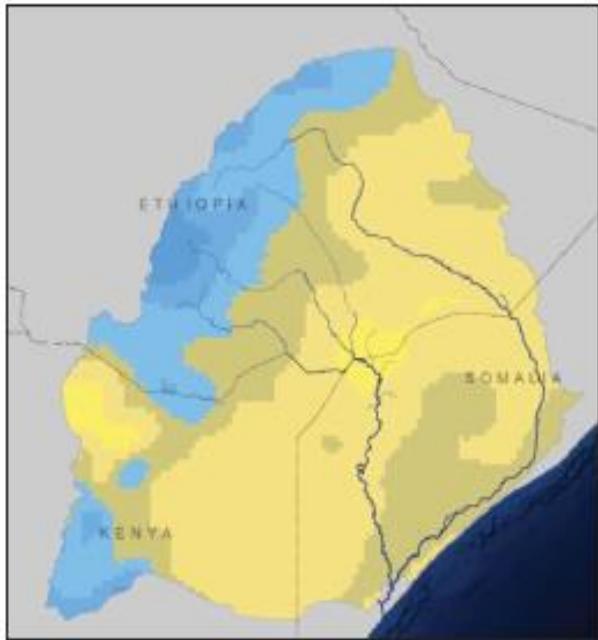
Somalia's two main rivers, the Juba and the Shabelle, generate fertile floodplains, sustain essential agriculture and crop production, and supply Mogadishu with water. Ethiopia, Kenya and Somalia share the Juba–Shabelle river basin, with Somalia being the lower riparian (see figure 1)⁶³. Both rivers 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 1 and 2). Increased dam-building activities in Ethiopia affect the river system further⁶⁴.

⁶¹Ogallo, L. A. et al., 'Land cover changes in Lower Jubba Somalia', *American Journal of Climate Change*, vol. 7, no. 3 Sep. 2018, pp. 367–87.

⁶²Thulstrup, A. W. et al., 'Uncovering the challenges of domestic energy access in the context of weather and climate extremes in Somalia', *Weather and Climate Extremes*, Sep. 2018.

⁶³UN Environment Programme (UNEP), *Africa Water Atlas*, Nairobi, 2010.

⁶⁴Somalia Water and Land Information Management (SWALIM) and Food and Agriculture Organization of the United Nations (FAO), 'The Juba and Shabelle rivers and their importance to Somalia', 2016.

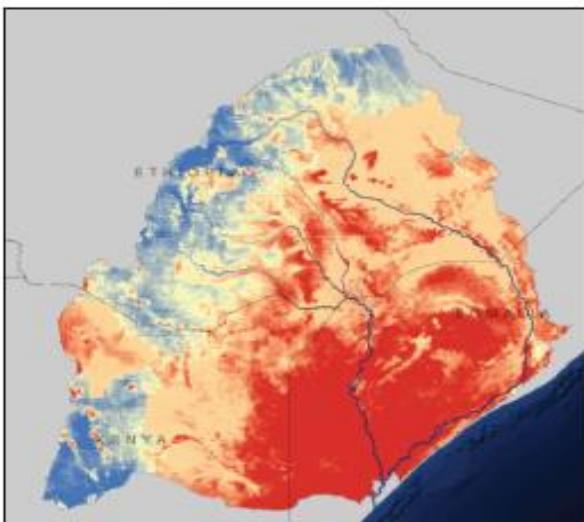


Juba-Shabelle river basin average annual rainfall

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).



Juba-Shabelle river basin modelled available runoff

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).



Map of Somalia showing Jubba and Shebelle River System

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>

Water Scarcity

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 125km 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.

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. South West 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.

3.1.6 Fisheries Resources

Somalia has the longest coastline in Africa, measuring 3,330 km, and it claims an Exclusive Economic Zone (EEZ) of 830,389 km². Its fishery resources are significant, with an estimated sustainable potential in the order of 200,000 MT per year for pelagic fish stocks, based on several fish surveys conducted in the 1970s and 1980s as reported in the FAO Fishery Country Profile for 2005. Large pelagic species include mainly yellowfin tuna (*Thunnus albacares*), bigeye tuna (*T. obesus*), longtail tuna (*T. tonggol*), bonito (*Sarda orientalis*), skipjack tuna (*Katsuwonus pelamis*), and Spanish mackerel (*Scomberomorus commerson*); the seasonal variations in abundance are considerable, confirming the oceanic migratory pattern of these species. With regards to small pelagics, the dominant species are the Indian oil sardinella (*Sardinella longiceps*), rainbow sardine (*Dussumieri acuta*), Scads (*Decaprurus spp*), chub mackerel (*Scomber japonicus*), horse mackerel (*Trachurus indicus*), and lesser quantities of anchovies (*Engraulis japonicus*, *Stolephorus spp*). The main distribution area of these species is along the northeast coast.

The small pelagic fish are scattered and there is no basis for fishery. However, their migrations, and that of straddling stocks, in and out of the national EEZ are unknown, according to the FAO Fishery Country Profile. Accessible stocks, for the artisanal fishing sector along the coast are estimated at about 40,000 MT of large demersal species, and 30,000 MT of sharks and rays. Demersal species make important contributions to the artisanal fisheries all along the Somali coast. Sharks and rays are caught mainly off the north coast, although in the southern part of the east coast they often represent 40 percent of the catch of artisanal fisheries.

Demersal fish species exploited in Somali waters comprise several hundred species, with the greatest concentrations in the coral reef region from Adale to the Kenyan border. The main commercial species groups include scavengers (*Lethrinidae*), groupers (*Serranidae*), snappers (*Lutjanidae*), grunts (*Pomadasytidae*), and seabreams (*Nemipteridae*), lizard fishes (*Synodontidae*), and goatfishes (*Mullidae*). The principal shark species groups are hammerheads (*Sphyrnidae*), grey sharks (*Carcharhinidae*), mako shark (*Lamnidae*), houndsharks (*Triakidae*) and dogfish (*Squalidae*). They are highly migratory and their migration patterns in the region are unknown.

According to the FAO, spiny lobsters of the genus *Panulirus* are exploited all along the coastline. They are mainly caught by divers in shallow waters, and occasionally by fishermen using large mesh nets. There is also a shrimp stock in the northern part of the coast (*Penaeus monodon*), which is currently exploited by two Djiboutian shrimp trawlers operating under a fishery agreement between Somaliland and Djibouti, amongst others. There are two fleets operating in Somali waters: an inshore fleet of nationally registered artisanal vessels and an offshore industrial fleet. In 2004, the artisanal fishery was producing up to 6,000 MT annually. The industrial fleet used to be licensed by the government but has all but ceased operations in the current climate. This sector was mostly composed of foreign vessels and produced about 13,000 MT annually in the mid-2000's. It is also reported that illegal, unreported and unregulated (IUU) fishing in Somali waters is carried out on a large scale, primarily due to the complete lack of MCS caused by the lack of an established state.

Somalia's marine fishery dominates the fishery sector. There is no history of aquaculture but there is small inland fishery sector mostly based on riverine systems.⁶⁵

⁶⁵ Fisheries in the ESA-IO Region: Profile and Trends (Somalia), 2014

3.1.7 Covid-19

The Covid pandemic was confirmed to have reached Somalia on 16 March 2020. On 12 May, Somalia reported 1,089 cases of the virus, and 52 deaths. The FGS formed a task force to respond to the pandemic, which has faced great difficulties in obtaining the relevant medical equipment. On 18 March the country suspended all international flights, except for humanitarian transports. Social distancing measures have proven difficult to implement in Somalia, and testing kits and facilities are scarce, making testing difficult.

Somalia operates 7 Emergency Operations Centers across the country, 14 isolation centers across Somalia, 4 out of 21 border crossings are open, 7 out of 8 seaports are open, and 1 out of 12 airports is open.

Two months later, on 18 May, OCHA reports that the number of cases have surged to 1421, with 56 deaths and 152 recoveries, presenting one of the highest numbers in East Africa.⁶⁶ The majority of cases is in the Benadir region. However, there is suspicion that cases are under-reported and the actual figure is significantly higher.

The FGS National Contingency Plan for Preparedness and Response to the Coronavirus defines as a general objective to support early detection, prevent and control of COVID-19 to contribute to reduction in morbidity and mortality associated with the virus. Specific objectives include enhancing coordination and leadership for preparedness and response, enhance national capacity to detect cases and institute responses, limit human transmission of COVID-19 through standard Infection Prevention and Control practices, and provide timely information and key messages to the public.

The Plan further describes the necessity to build capacity among health workers in managing highly infectious diseases. It prescribes training to a national core team, and their subsequent deployment to manage infections by zone. In addition, frontline health workers in the communities are equipped to promptly detect COVID-19 cases.

The FGS is planning to establish 7 quarantine centers and 7 isolation centers across the country. Somalia currently has 4 laboratories operating with varying capacities. The National Public Health Laboratory in Mogadishu is the most advanced. Three laboratories are currently able to detect COVID-19: Mogadishu, Garowe and Hargeisa.⁶⁷ Through the polio surveillance networks, biological samples are collected and shipped to either of the laboratories.

Somalia has 23 ports of entry. Health workers have been deployed at the four main airports to screen travelers upon arrival. Three out of four airports have established isolation rooms, while in Mogadishu and Garowe, ambulances are on stand-by to transfer suspected cases to isolation facilities. While travelers at the airports are screened, they are not tested.

The Early Warning and Response Network (EWARN) had been set up in 535 sentinel facilities to report and alert in regards to epidemic prone diseases. Verification of alerts is implemented by a Rapid Response Team at the District level, supported by WHO and the Ministry of Health. However, reporting can be sporadic due to lack of means of communication and high staff turn-over.

⁶⁶ OCHA Somalia: Somalia COVID-19 Impact Update No.6

⁶⁷ Ditto

WHO has supported deployment of 4,000 health care workers throughout Somalia. Each health care workers aims to visit 5,000 homes per month to actively identify cases and trace contacts. Information on potential cases is relayed to Rapid Response Teams.

Testing capacities, however, are still low. The Galmudug State Ministry of Health, for example, has appealed for support to establish local testing facilities. Currently, samples are transported to Mogadishu for testing.

COVID-19 has significant economic impact. The FGS currently projects an 11% decline in the nominal GDP for 2020. Remittances received by nearly half of Somalis have dropped by approximately 50%.⁶⁸

Of further concern is recent flooding, which caused displacement of 412,000 people in 29 districts. Most of them have fled to higher grounds and have taken shelter in already crowded villages. WHO estimates that this can speed up the transmission of COVID-19, given the crowded living conditions.

3.2. Socio-Economic Baseline

3.2.1. Economic Outlook and Macro-economic Performance

On March 5 2020, the FGS cleared its arrears to IDA, and with that fully re-established its access to new resources from IDA, as well as receive debt relief under the Heavily Indebted Poor Country (HIPC) and Multilateral Debt Relief Initiative (MDRI).⁶⁹

Somalia's economy is largely consumption-based and dominated by agriculture, while it is also supported by remittances and large aid flows. Remittances and aid flows are estimated at USD 1.4 billion a year, which represents 29 per cent of Somalia's GDP in 2018. Agriculture plays a key role by constituting 75 per cent of GDP, and 93 per cent of total exports. Other sectors driving growth are construction, telecommunications and money transfer services.⁷⁰

Continued conflict and frequent natural disaster have contributed to significant poverty in Somalia. About 69 per cent of Somalis live below the poverty line. Poverty is thereby most acute among children, youth, and IDPs, as well as persons living in rural areas.⁷¹

Approximately half of Somalia's population depends on pastoralist and agro-pastoralist activities. According to the recent Flood Impact Needs Assessment conducted by the FGS and the World Bank, this means that people remain highly vulnerable to natural disasters.⁷² However, the findings from the assessment also show that while the recent flood has had devastating impacts on infrastructure, it has helped to increase agricultural outputs, due to above average rainfall.⁷³ In turn, the recent floods pose a

⁶⁸ Ditto

⁶⁹ See The World Bank, Somalia Clears Arrears to World Bank Group, Press Release March 5, 2020, accessed at: <https://www.worldbank.org/en/news/press-release/2020/03/05/somalia-clears-arrears-to-world-bank-group>

⁷⁰ Government of the Federal Republic of Somalia and The World Bank, Somalia. 2019 Flood Impact and Needs Assessment, February 2020, p. 18.

⁷¹ Government of the Federal Republic of Somalia and The World Bank 2020, p. 18.

⁷² Government of the Federal Republic of Somalia and The World Bank 2020, p. 18.

⁷³ Government of the Federal Republic of Somalia and The World Bank 2020, p.17.

significant threat of a desert locust outbreak, which poses risks to the macroeconomic outlook and a threat to livelihoods of the population.⁷⁴

3.2.2. Human Development

Somalia scores very low on UNDP's Human Development Index. Although it has not been ranked for a few years, different indicators reveal low scores. For example, life expectancy at birth lies at 57.1 years with a global average of 56 years⁷⁵ in low human development countries⁷⁶; and the mortality rate under the age of 5 lies at 127 per 1000 life births⁷⁷, while the global average is 39⁷⁸.

Education: The school enrollment rates in Somalia are among the lowest in the world. In the education sector, only 16 per cent of the Somali population have completed primary school and only 7 per cent have finished secondary school.⁷⁹ 3 million children between the age of 6 and 18 do not attend any school. At the primary level, about 60% of children do not attend school. At the secondary level 92 per cent of children (in south central parts of the country) do not attend school. The recent flooding has caused additional challenges on the education of children, as it has displaced people, made access more difficult and has caused the exclusion of some.⁸⁰

Literacy in Somalia is 40 per cent among the adult population, with male literacy being 8 per cent higher than female. There are significant differences in the literacy rate between social groupings. For example, urban populations have the highest literacy rate with 64 percent, while nomadic populations have the lowest literacy rate with 12 per cent. Among the FMS, Hirshabelle has the lowest literacy rate with 20 per cent; South West State has 26 per cent and Jubaland 29 per cent.⁸¹

In particular in South Central Somalia, child recruitment, compulsory military training, segregation of boys and girls classes and concerns over attacks on education institutions remain key challenges in the provision of education for all children. Furthermore, there are inadequate water and sanitation facilities, limited classrooms and supplies, as well as a shortage of teachers in overcrowded schools. Additional enrollments of IDP children makes the situation even more dire. Absence of school feeding programs in famine and drought zones disrupts school attendance as well and drops the nutrition status of children.⁸²

Access to education is particularly difficult for nomadic / pastoralist populations. Only 16 per cent of nomadic population age 6 and above are enrolled in education.⁸³

Health: Availability and access to health facilities is similarly dire. A comprehensive review of the health sector in 2015 showed that health facilities are mainly located in the urban areas and difficult to access

⁷⁴ Government of the Federal Republic of Somalia and The World Bank 2020, p. 19.

⁷⁵ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

⁷⁶ UNDP, Human Development Report 2019, p.38.

⁷⁷ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

⁷⁸ WHO, Children. Reducing Mortality, factsheet, accessed at: <https://www.who.int/news-room/fact-sheets/detail/children-reducing-mortality>

⁷⁹ UNICEF and World Health Organization, Joint Monitoring Program, 2019, accessed at: <https://washdata.org/data#/som>.

⁸⁰ Government of the Federal Republic of Somalia and The World Bank, Somalia. 2019 Flood Impact and Needs Assessment, February 2020, p. 58

⁸¹ FGS, Ministry of Education, Culture and Higher Education, Education Sector Strategic Plan 2018-2020, p.29

⁸² Ditto, p. 25-26

⁸³ Ditto, p. 30

for the majority of the rural population. Health facilities are resourced poorly, and there is a critical lack of health workers. According to WHO, only one in three Somalis have access to safe water, and one in nine Somali children die before their first birthday, and ca. 3.2 million Somalis are in need of emergency health services.

Due to poor living conditions there are high risks of measles outbreaks, acute watery diarrhea and cholera. Those residing in IDP settlements are most affected.⁸⁴

Reproductive health indicators are poor. Maternal mortality is estimated at 734 for every 100,000 births. Under-five mortality rate was at 133 per 1,000 births before the recent drought.⁸⁵ Neonatal mortality rate per 1000 live births is 39.7.⁸⁶

WASH: Access to safe water is low in Somalia, access to basic water supply lies at 83 per cent in the urban areas and 28 per cent in rural areas. 61 per cent of the population has access to basic sanitation facilities in urban areas and 20 per cent in rural areas. According to a UNICEF report, the key challenges are weak water supply management models, high operational management costs and technical limitations. There is further a lack of a harmonized legal and policy framework and policies in place and inconsistent with implementation.⁸⁷

Continued droughts have had negative impact on the water sector, and conflicts have weakened the water supply and sanitation services. WASH facilities have been destroyed as a result of conflict, and there is a lack of sufficient WASH facilities for the large number of IDPs. Furthermore, the population pressure causes over pumping of ground water, and the wearing out of equipment.⁸⁸

Various aid programs have supported the development of latrines. However, UNICEF remarks that there is little impact on increased use of latrines or improved sanitation and hygiene. There is further a lack of sustainability of latrines and little indication of behavioral changes among the population.

Widespread displacement and recurrent emergencies contribute to this dire picture. Diseases like cholera are therefore widespread in Somalia, with a total of 164,000 cases reported between 2006 and 2015.⁸⁹

3.2.3. Governance Structures

The Provisional Constitution of Somalia established the Federal Government of Somalia as well as the legal framework for the formation of Federal Member States (FMS). The latter have a degree of autonomy over regional affairs and maintain their own police and security forces. Somalia is currently divided into six FMS, namely South West State of Somalia, Somaliland, Puntland, Hirshabelle and Galmudug.

⁸⁴ WHO, Humanitarian Response Plan 2015, accessed at: <https://www.who.int/hac/donorinfo/somalia.pdf>

⁸⁵ UNICEF and World Health Organization, Joint Monitoring Program, 2019, accessed at: <https://washdata.org/data#/!som>.

⁸⁶ WHO, Somalia, Country Cooperation Strategy at a Glance, 2018, p.1, accessed at: https://apps.who.int/iris/bitstream/handle/10665/136871/ccsbrief_som_en.pdf;jsessionid=01FEF030DB9DD0DE3F6C832FEF64EDCD?sequence=1

⁸⁷ UNICEF Somalia Country Office, Water, Sanitation & Hygiene (WASH) Profile, February 2020, p.2, accessed at: <https://www.unicef.org/somalia/media/1251/file/Somalia-wash-profile-February-2020.pdf>

⁸⁸ Ditto, p. 2

⁸⁹ Ditto, p. 3.

The Provisional Constitution (Article 48) also acknowledges the local governments in Somalia, although levels of administration, fiscal autonomy and other issues still need to be determined. At the local government level, States are divided into administrative regions, which in turn are divided into districts.

The Federal Parliament has the mandate to select the autonomous regional states. Legislature in 2014 established the Boundary and Federalization Commission for this purpose. States are further divided into Districts and Zones.

3.2.4. Agriculture

Somalia has a total area of about 137,600sqkms. 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.

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.

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.⁹⁰

Rainfed 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.

Livestock: 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

⁹⁰ Somali Core Economic Institutions and Opportunities Program ESMF, 2017, p 18

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 the 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 Red Sea.

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.

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.⁹¹

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.⁹² In addition, the poor state of waters and transport infrastructures has kept the agricultural sector from recovering and becoming resilient.⁹³

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.

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.⁹⁴

⁹¹ Somali Core Economic Institutions and Opportunities Program ESMF, 2017.

⁹² Government of the Federal Republic of Somalia and The World Bank 2020, p.21.

⁹³ Government of the Federal Republic of Somalia and The World Bank 2020, p.22.

⁹⁴ UNFAO, Somalia Humanitarian Response Plan 2020, accessed at: <http://www.fao.org/3/ca7825en/CA7825EN.pdf>

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.⁹⁵

Agriculture – Fisheries: Marine fishery dominates the fisheries sector. Coastal communities are heavily dependent on fishing, carried out mostly by men. Women dominate fish processing, trading, and support activities, and some women are multiple boat owners, although there are no specific numbers available to quantify the division of labor in the sector between men and women. Fishing is, however, a seasonal activity for many rural dwellers, including pastoralists, and often an important source of supplementary food and cash income. The impact of the drought is minimal on the marine fisheries sector, but has significant potential to negatively impact the small inland fisheries sector, which provides essential household food security and some income.

Food Security: Food security is a cross-cutting sector that reflects the combined effects of drought on food security related sectors such as agriculture (crop production, access to agricultural employment), livestock (livestock production and reproduction), trade and market prices (food and livestock prices and purchasing power of the population). Following consecutive seasons of poor *Gu* and *Deyr*, food crisis has worsened in rural areas.

Health: The conflict-related fragility of Somalia over the past two and a half decades has resulted in the weakening of the health sector, its systems and its personnel, with a related focus on emergency response interventions to recurrent crises. Countrywide, there is less than 1 health facility per 10,000 people, and many health posts do not operate fully due to human resource and infrastructure constraints. A pre-drought survey identified a total of 1,074 facilities in existence, of which 106 were found to be non-functional and 169 unreachable due to conflict and other similar factors. A serious scarcity of health workers is a major challenge faced by the sector. Approximately 3.3 million people were in need of emergency health services in 2016.

Nutrition: Somalia is among the ten countries with the highest prevalence of malnutrition in the world, and the third highest in the eastern and southern Africa region, at 17.42 percent Global Acute Malnutrition (GAM) amongst children under five years (U5), with 3.2 percent being severely malnourished.

3.2.5. Labor and Employment

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.⁹⁶ 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.⁹⁷

⁹⁵ Government of the Federal Republic of Somalia and The World Bank 2020, p.19.

⁹⁶ Federal Government of Somalia, Ministry of Education, Culture and Higher Education, Education Sector Strategic Plan 2018-2020, p.13

⁹⁷ 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/>

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.⁹⁸

3.2.6. Land Issues

Land conflicts in Somalia have risen to be one of the key issues of instability at the community and inter-community level. This is partly due to a complex situation of land tenure. While the Agricultural Land Law of 1975 abolished private ownership, the current situation is very unclear. Only few locals registered their land at the time, and the civil war further impacted the situation negatively. Customary land tenure has therefore taken the center stage in ordering land ownership and usage. It is focused on clan relations and on pastoral land use rather than norms of individual ownership. The Provisional Constitution defines land as public property. The government has created means to transfer some land into private ownership by granting ownership for urban and agricultural land.⁹⁹ Formal legal frameworks now exist alongside customary land management.

Land disputes and grievances have been identified in the existing literature as a major issue of contestation. There are different categories of causes of land-related grievances. One, powerful groups and individuals take land illegally, often from the poor or minority groups, who cannot defend themselves. This is based on the fact that land prices in Mogadishu have skyrocketed in recent years, and land has become a popular commodity.¹⁰⁰ Two, Somalis returning from overseas to Mogadishu often claim back their land, which causes a variety of land grievances, as the land has often been occupied by others in their absence.¹⁰¹ Three, there are multiple questions of land inheritance, especially given the large group of members in a family, as well as the return of Diaspora members who may have claims to inherit land.¹⁰² Four, given Mogadishu's history of contestation, occupation and civil war, multiple title deeds have been issued over the years and continue to be manufactured. This is a key cause for land disputes when multiple owners put claims on a piece of land.¹⁰³ Five, of concern to the citizens of Mogadishu is the unregulated sale of public property, as well as the destruction of historic property. Sales often take place between government representatives and private interest groups, without any possibility for recourse by citizens. Six, land occupation in Mogadishu and BRA is ongoing, and has the potential to result in greater conflicts. This is underpinned by an overlapping and uncoordinated land administration system. A study on land in Mogadishu by the Rift Valley Institute (RVI) even estimated that 80% of cases filed at the Supreme Court are connected to land grievances.¹⁰⁴

Furthermore, ongoing forced evictions are a key challenge for IDPs in Somalia. Due to insecure land tenure arrangements in IDP settlements, it is often difficult for IDPs to secure their rights. According to ReDSS,

⁹⁸ ILO, Decent Work Programme, Somalia 2011-2015, p. 12.

⁹⁹ IGAD, Somalia. Land Governance Country Profile, Assessment of Land Governance Framework, Training & Research Land Governance Institutions, accessed at: <https://land.igad.int/index.php/countries/39-countries/somalia/40-somalia-profile?showall=1>

¹⁰⁰ Rift Valley Institute / Heritage Institute, Land Matters in Mogadishu. Settlement, Ownership and Displacement in a contested city, 2017, p. 53

¹⁰¹ RVI 2017, p.54

¹⁰² RVI 2017, 57

¹⁰³ RVI 2017, 58

¹⁰⁴ RVI 2017, p. 67

an annual average of 155,000 individuals have been evicted across Somalia, mainly in Mogadishu and Baidoa. Evictions take place from both, public and private infrastructure. Key protection challenges are that IDPs settle on public land or private lots with contested ownership. Women and girls are thereby most vulnerable, as they encounter GBV challenges in addition to loss of assets and livelihoods.¹⁰⁵

3.2.7. Cultural Heritage

Somalia has rich cultural heritage due to its own cultural goods 'dhaqan', including the fundaments of a segmentary society and the resulting social fabric. Traditions often originate in the proto-Somali cultural era or originate in the many interactions Somali populations had with other cultures, including those from the Arabian peninsular, India, and sub-Saharan Africa. The protracted conflicts and the civil war in Somalia, however, have had significant impact on the loss of tangible and intangible cultural heritage. Deliberate efforts have to be made to protect cultural heritage. Unfortunately the country's legislation around these issues has not yet been developed and does not legally enforce the protection and preservation of cultural artefacts, cultural heritage and distinct sub-national identities. Especially infrastructure development project therefore need to support the protection of places of cultural and religious significance, including graveyards, religious buildings, and historical sites.

3.2.8. Security and Conflict Environment

Somalia ranks second on the Fragile State Index from 2019 with a total score of 112.3, only topped by Yemen with a score of 113.5.¹⁰⁶ Somalia's indicators on factionalized elites, and demographic pressures score the highest.

Somalia has had a long history of civil war, which followed the Siad Barre regime that ended in 1991. Clan-based militias turned the country into chaos and prevented an effective central government for a long time. A Transitional Federal Government was formed in the early 2000s, which was succeeded by the internationally recognized Federal Government of Somalia, which was formed under Hassan Sheik as a President. In 2012, after the adoption of the Provisional Constitution, the first internationally recognized Federal Government of Somalia (FGS) came into power following more than two decades of civil war and transitional governance arrangements. With the new President, the federal statebuilding process commenced¹⁰⁷ under the framework of the distinct peacebuilding and statebuilding goals of the New Deal/Compact, which was signed in September 2013. However, the last years have been dominated by political infights and clan-related tensions, including in the establishment of the FMS. This has worsened the security situation in Somalia significantly.

There is significant conflict at different levels in Somalia. Some insecurity stems from clan competition, which goes back into history and historical movements and power distribution. Often it is combined with localized competition over resources, for example over land or water sources. Such insecurity and conflict can be due to continued local tension between different communities, competition over sources of power,

¹⁰⁵ ReDSS, Forced Evictions as an obstacle for durable solutions in Somalia, March 2018, accessed at: <http://regionaldss.org/wp-content/uploads/2018/03/Forced-evictions-as-an-obstacle-to-durable-solutions-210318.pdf>

¹⁰⁶ Fragile State Index 2019, accessed at: <https://fragilestatesindex.org/data/>

¹⁰⁷ Under the Federal Government of Somalia (FGS), the state level governments are Puntland State of Somalia, Jubaland State of Somalia, and two interim administrations, i.e. Galmudug State and the Interim South West Administration. Somaliland is a self-declared state. State formation is currently ongoing in the Hiraan and Middle Shabelle regions.

such as governmental positions, as well as competition over aid resources brought down to the state or district level.

The social impacts and potential aggravation of resource-related conflicts is well documented in a range of pastoralist and agro-pastoralist assessments carried out in the Somali region.¹⁰⁸ Access to water and pasture is a fundamental source of both conflict and co-operation 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 exists¹⁰⁹. 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.

The Islamist group Al-Shabaab still controls areas in South Central Somalia, providing harsh treatment, forced recruitment vis-à-vis the local populations. It infiltrates other areas and conducts deadly attacks on citizens. Most importantly, Al Shabaab has introduced a harsh tax system in its areas of control and beyond. It has also started to expand on other administrative functions, such as the provision of justice.¹¹⁰ Given the weakness of the formal justice system, people have been flogging to Al Shabaab courts, where swift justice and the execution of judgments is guaranteed. Al Shabaab remains as a key source of violence, attacking government facilities, personnel, security forces, and members of international organizations.

In 2019, Somali-led offensives in Lower Shabelle have led to the ousting of Al Shabaab in the area. However, Al Shabaab has shifted to different areas and has maintained attacks on the newly recovered area.¹¹¹

Different armed groups maintain checkpoints along key arteries of the country to extract fees from travelers. People are thereby associated with their clans, and have difficulties moving and working in areas in which their clans are not prominent. Even government checkpoints can be little efficient, as they are subject to corruption.¹¹²

Somalia therefore remains trapped in continued fragility, which is protracted by insecurity, endemic corruption, fledgling government capacity, predatory armed groups and spoiler networks. This poses significant security risks for the population, but also for project activities. These include terrorist attacks, hijackings, abductions, and killings. The state security apparatus is thereby very weak, and is underpinned by clan dimensions as well. There are sometimes blurred lines between the state security apparatus, local militia or other armed factions.

¹⁰⁸ Lewis 1961; Lewis 1998; DfID 2005; Gomes 2006 Access to water for pastoral resources management

¹⁰⁹ Ditto

¹¹⁰ Security Council, S/2019/858, p.3

¹¹¹ Security Council, S/2019/884, p. 3/17

¹¹² J. Sanya and I. Mwenda, Mogadishu. When Checkpoints don't work, Horn International Institute for Strategic Studies, accessed at: <https://horninstitute.org/mogadishu-when-checkpoints-dont-work/>

3.2.9. Vulnerability and Social Exclusion

Internal Displacement: In April 2020, OCHA report 2.6 million IDPs in Somalia¹¹³, due to disaster and conflict among other issues. Conflict and violence triggered 578,000 new displacements; and disasters 547,000.¹¹⁴ During the drought in 2017, people dependent on livestock and agriculture had to abandon their rural homes to find new opportunities, migrating predominantly to urban areas.

Drought conditions are contributing to already pronounced rates of acute and protracted displacement. More than 278,000 people have been displaced in March alone within Somalia due to the drought, bringing the total number to approximately 585,630 since December 2016¹¹⁵.

While data on the demographic profile of migrating populations is needed, it is likely these drought-related internal displacements may be from minority clans, who have lost assets including their homes, livestock, and livelihoods. Camps are heavily congested and have also proportionally received the largest number of new arrivals¹¹⁶. Displaced women and girls are among the most vulnerable populations and face multiple constraints including lack of access to adequate shelter, livelihoods and access to critical resources, including land. The attendant separation of many women and girls from community and familial support structures, as well as from traditional livelihoods activities, also contributes to an increased reliance particularly of women on marginal, inconsistent and hazardous livelihood strategies, which often increases exposure to violence.

IDPs commonly settle in informal urban settlements, where access to services and conditions are poor, and where they often become victims of forced eviction. Conditions of displacement often compound existing conditions of vulnerability and poverty. They are therefore part of the poorest strata in Somalia, and are often in dire need of access to food, water, sanitation, health services, shelter and education.¹¹⁷

Following a recent survey, a move to urban centers comes with some improvements in health and education for IDPs, but also with reduced access to work and lower income. 61 percent of male IDPs claim that they had work and an income before displacement, in comparison to 40 per cent after displacement. However, members of the host communities state the opposite since the arrival of the IDPs – they now claim to suffer from less employment.¹¹⁸ The greatest loss affecting IDPs is the loss of secure housing. 77 per cent of IDPs claimed to have owned a house before they were displaced.¹¹⁹ Some IDPs receive support from their families in the Diaspora. More than a third of IDPs report to receiving remittances from overseas of an average monthly value of 113 USD.¹²⁰ However, IDPs often have less remittances than other Somalis, extending in part from the separation from social networks that would otherwise provide support. Only 7 percent of IDPs rely on remittances.¹²¹

¹¹³ OCHA, Somalia Situation Report, 5 April 2020.

¹¹⁴ Internal Displacement Monitoring Center, The Ripple Effect. Economic Impacts of Internal Displacement. Case Studies in Eswatini, Ethiopia, Kenya and Somalia, Thematic Series, January 2020, p. 30.

¹¹⁵ UNHCR, UN Habitat, IOM, JIRA and Local Ministries of Interior, IOM and The World Bank, 2017

¹¹⁶ JRIA 2016

¹¹⁷ Internal Displacement Monitoring Center 2020, p. 30.

¹¹⁸ Ditto, p. 30.

¹¹⁹ Ditto, p. 33.

¹²⁰ Ditto, p. 31.

¹²¹ The World Bank, Somali Poverty and Vulnerability Assessment, Findings from the Wave 2 of the Somali High Frequency Survey, April 2019, p.73

In view of education and health, IDPs generally report better access than before their displacement. IDPs generally appear to have better access to education. Access to schools was usually more challenging in their previous rural homes. Access to health care has slightly improved since IDPs left their rural homes. 25 per cent of IDPs state that they have better access to health care than previously, while 60 per cent state there is no change. However, there are also significant concerns about improper sanitation and the outbreak of diseases in IDP settlements.¹²² However, while this mostly applies to urban IDP, generally, the socio-economic and human development indicators for IDPs are worse than those of non-IDPs. While 7 in 10 Somalis are poor, over three in four IDPs live under 1.90 \$ per day.¹²³

Gender-Based Violence and Gender Dynamics. Differentiated social roles and responsibilities between men and women across livelihood systems have implications on the available mechanisms to cope and respond to external shocks such as drought. In the face of crisis, such as insecurity, drought or famine, men and women adopt different coping strategies to increase household resilience. Family splitting, for example, constitutes an important survival mechanism as families break up to spread economic risks and increase access to livelihood opportunities¹²⁴. Men and older boys may take herds and migrate longer distances in search of water, resources, or possible alternative livelihoods, while women remain with small children, the elderly and weaker animals, or travel to IDP camps in search of access to resources and security¹²⁵. Male household members may migrate to urban centers seeking economic opportunities. Alternatively, women sometimes travel to towns to engage in petty trade and engage in the informal economy.

Available economic opportunities, however, are still quite limited for both men and women and female-headed households remain among the most vulnerable populations. Unemployment rates remain particularly high for women, and especially female IDPs who often remain reliant on charity through social protection mechanisms and contributions from the diaspora in the form of remittances. Women who are engaged in income generating activities are often engaged in the informal sector and further bear the double domestic burden of earning an income and taking care of the home. The consequences of this burden often fall to girls in the family, who are expected to contribute to the maintenance of the home, often at the expense of girls' education and skills development¹²⁶.

Women representation in politics and governance bodies has remained scarce. Political power and authority are perceived as masculine spaces, and the few women who are included in politics mostly act through their husbands or other male family members. Analytical work on political economy in Somalia has shown that political power is deeply rooted in access to resources. Women's economic empowerment should therefore play a fundamental role in their rise in politics and decision-making spheres. However, to date no analysis has explored the links between economic empowerment initiatives and political empowerment, nor has rigorous political economy analysis been coupled with a gender analysis. At least 30 per cent of seats in the national Parliament are reserved for women; while women's representation in Parliament has improved in recent years, at 24 percent representation, this quota remains unmet.

¹²² Internal Displacement Monitoring Center, p. 36

¹²³ The World Bank, Somali Poverty and Vulnerability Assessment, Findings from the Wave 2 of the Somali High Frequency Survey, April 2019, p.73

¹²⁴ Gardner, J, "Changing Roles and Responsibilities in the Family." In *Somalia – The Untold Story: The War through the Eyes of Somali Women*, ed. Judith Gardner and Judy El Bushra, 99-106, 2004, London: CIR and Pluto Press.

¹²⁵ Ibrahim, Rhoda M. 2004. "Women's Role in the Pastoral Economy." In *Somalia – The Untold Story: The War through the Eyes of Somali Women*, ed. Judith Gardner and Judy El Bushra, 24-50, 2004, London: CIR and Pluto Press.

¹²⁶ Interagency Working Group on Disaster Preparedness for East and Central Africa.

While there is a lack of statistical data on the situation of women in Somalia, the available evidence shows that Somali women are still far from enjoying equal rights and treatment. The Social Institutions & Gender Index for 2014 places Somalia on the 6th lowest position in the world, with 'very high' discriminatory family codes, 'very high' levels of restricted physical integrity, and a 'very high' level of restricted resources and assets.¹²⁷ The continuation of practices, such as polygyny, early and forced marriages, FGM, and wife inheritance, continues to undermine development towards increased gender equality. Lack of access to services, such as education and health, or lack of access to agricultural production or other livelihoods and employment opportunities have kept most of the female population of Somalia disempowered.

The Provisional Constitution and the FGS have made commitments on women's empowerment and gender mainstreaming. The Constitution provides for the protection of women¹²⁸, including the outlawing of female circumcision (Article 15) and protection from sexual abuse (Article 24(5)).

Insecurity for women is still the number one issue that prevents gender equality and women's empowerment from being a feasible objective. Women continue to suffer disproportionately from clan-fights and extremist interventions. Formal security forces have proven to be weak in their willingness to protect women, and the justice apparatus has failed survivors of conflict-related GBV¹²⁹, as well as the many survivors of domestic violence and FGM. Protracted conflict and fragility have increased fundamentalist religious interpretations, including the acceptance of pharaonic-type FGM by a younger generation.¹³⁰

The ongoing fragility and conflict in Somalia is responsible for an increasing number of Internally Displaced Persons (IDP) within Somalia, including a high proportion of women. They are often subject to poor security arrangements, which leave women and girls particularly vulnerable. In this context, as well as outside IDP camps, GBV (particularly rape) is widespread, including as a tool between social units in conflict.¹³¹ The UN has consistently reported that between 75-85% of GBV incidents collected through the Gender-Based Violence Information Management System (GBVIMS) are perpetrated against IDPs.¹³²

Available information indicates that sexual violence and GBV in the country are very high. In particular, sexual violence against women has been used as a tool of war, including leheyeste-galmo, a form of sexual

¹²⁷ OECD Development Center, Social Institutions and Gender Index, 2014, accessed at: http://genderindex.org/ranking?order=field_sigi_value14_value&sort=asc

¹²⁸ LOGICA, Gender and Conflict Note Somalia, March 2013, p. 2, accessed at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/03/31/000333037_20140331154002/Rendered/PDF/862980BR10Box30gica0DissNoteSomalia.pdf

¹²⁹ Implementation of the Beijing Platform for Action. Beijing +20 Review. Somalia Country Report 2014, p. 14

¹³⁰ See, for example, NAFIS Network/MOLSA, Assessment of the Prevalence, Perception and Attitude of Female Genital Mutilation in Somaliland, 2014.

¹³¹ See, for example, UNICEF 'Sexual Violence as a Weapon of War, accessed at: <http://www.unicef.org/sowc96pk/sexiol.htm>

¹³² Somalia Humanitarian Country Team, 2019, Humanitarian Needs Overview, accessed at: https://reliefweb.int/sites/reliefweb.int/files/resources/Somalia_2019_HNO.PDF; UNFPA, September 2016, Somalia Gender Based Violence Sub-Cluster Bulletin, accessible at <https://somalia.unfpa.org/en/publications/somalia-gender-based-violence-sub-cluster-bulletin>; UNFPA, December 2016, Somalia: Gender Based Violence Sub-cluster Bulletin, accessed at https://somalia.unfpa.org/sites/default/files/pub-pdf/Dec_GBV%20Bulletin%20%283%29.pdf; UNFPA, August 2015, Somalia: Gender Based Violence Sub-cluster Bulletin, accessible at <https://reliefweb.int/report/somalia/somalia-gbv-sub-cluster-bulletin-1-january-august-2015>

hostage-taking as well as child marriage, FGMC (98% of female population in Somalia), rape and intimate domestic violence (IPV) which already existed but were normalized after conflict.¹³³

Rape is increasing in prevalence, becoming more violent and taking on a more normalized form. There are reports of an increase of gang rape and “date rape” as a youth phenomenon driven by frustrations associated with lack of opportunity and access to marriage.¹³⁴ Rape cases reports indicate that it primarily affect younger women between the ages of 11–25 years as well as children, both girls and boys. In South-Central Somalia and IDP areas, perpetrators are often ‘uniformed’.¹³⁵

The UNHCR Protection Return Monitoring Network (PRMN) estimates that floods have displaced 20,308 people in Middle Shabelle; 7,643 in Bay; 3,227 in Middle Juba; 2,923 in Banadir; and, 678 in Bakool region. An initial assessment conducted by UNFPA and its implementing partners in the affected regions has identified damages and access challenges to the health facilities and GBV one-stop centers which support vulnerable women and girls including pregnant women, and survivors of gender based violence. Hence the need for SRH and GBV services to the affected populations. At least 20,340 women and girls are estimated to be at risk of gender-based violence as the displacement weakens traditional family and community protection mechanisms. Recurrent floods, drought, protracted conflict and armed attacks in Somalia have resulted in insecurity, major protection challenges, food insecurity and also extremely weakened basic socio-economic services¹³⁶.

There are significant barriers to access to justice. Fear of reprisals or punishment deters survivors of GBV from reporting incidents. Survivors are often reluctant to pursue cases against the perpetrator due to the social stigma associated with rape and other forms of GBV. In south and central Somalia, survivors, lawyers, witnesses, journalists, and family members have been threatened, harassed, and arrested for reporting GBV offences. Legal aid providers regularly receive death threats towards their staff. Fear of reprisals to staff, survivors, witnesses, and medical personnel is a particular problem if perpetrators are from the security forces.

Most domestic violence and sexual violence cases are dealt with through the customary and Sharia legal systems. Anecdotal evidence indicates that some customary practices result in a double victimization of women and girls, denial of justice for many survivors, and impunity for perpetrators. The customary justice system is focused on clans. Justice is delivered for the clan rather than for the survivor of the sexual violence. Traditional approaches to dealing with rape seek resolution or compensation through negotiation between clan members. Restitution is paid to the clan and not to the survivor. Once restitution is paid, the perpetrator of the sexual violence is free from further punishment and the case is considered finalized. In some cases, the woman or girl is forced to marry the perpetrator of the violence as a form of “restitution” ordered by customary courts. The customary system is widespread, and many families and clans choose it over other justice systems¹³⁷.

In view of inheritance and access to resources, women are exposed to housing, land and property violations, especially land-grabbing and denials of inheritance. The fact that, after marriage,¹¹ women will likely enter a different family limits women’s inheritance. Investing in women is perceived as a misuse of

¹³³ Expanding Access to Justice Program, Gender Assessment, 2019.

¹³⁴ Ditto.

¹³⁵ For example, security and law enforcement officials, AMISOM, gang-members and/or freelance militia

¹³⁶ UNFPA Flood reponse Situation Report, November 2019.

¹³⁷UNDP 2018

scarce resources in times of poverty and conflict. Therefore, women rarely inherit valuable assets such as land and income-producing animals. Also, women are not considered principals; they are not diya-paying members and thus do not usually share in diya receipts, even if they relate to a violation against them. This creates important vulnerabilities for women, while a woman must be protected by her clan members by convention, as a non-diya paying member and one who cannot contribute to clan security in times of conflict, women will always be less valuable and more dispensable¹³⁸.

In view of masculinities, in Somalia attaining manhood requires a man to master skills, cultivate qualities and repeatedly prove himself throughout his lifetime. A man's reputation, status and power depend on how well he is judged to fulfill his obligations within his family and clan. In doing this he also contributes to his lineage group. Women are stakeholders and collaborators in the attainment of manhood. Since the war in 1991, the majority of men lack the resources to fulfill their gender specific expectation and responsibilities. Men have become vulnerable and are at risk of revenge killing a war-related phenomena that affects male mobility and work opportunities which puts pressure on women to act as breadwinners. Men have been forced to leave outside of their clan territory, which make them leave in constant fear without the protection of the clan¹³⁹. Interventions for women and children should consider the well-being of the family as a whole. A positive engagement with the issues confronting Somali men should be part of any attempt to address the needs of women and children.

In view of child labor and trafficking, in Somali culture, girls and boys are expected to take part in household chores from around the age of five years, especially in rural areas. The distribution of such tasks is highly gendered and the burden skewed towards girls. Boys are usually responsible for maintaining income-earning and food-producing animals such as cattle and goats, while girls attend more to cooking, cleaning and resource gathering responsibilities. In situations of extreme poverty, girls may work in domestic roles or engage in survival sex. Poverty-driven child labor is not generally considered to be a violation of children's rights and children are forcibly recruited within Somalia and used as labor in agriculture, livestock herding, construction, sexual servitude, domestic service and sexual exploitation.

The rate of female genital mutilation in Somalia is estimated at 98 percent. This harmful practice carries serious health consequences and it increases the likelihood of dying during childbirth. Nearly 50 percent of the girls are forced to marry before they turn 18. Being married robs them of their childhoods and increases the likelihood of early pregnancy and school dropout. Existing protection services are inadequate, especially in remote and in warring communities: there is widespread failure to promote and protect the rights of children¹⁴⁰.

3.2.10. Youth as a Vulnerable Group

According to UNFPA, 38% of Somalia's population is at the age between 15-35 years. The majority of young people lives in the urban areas, 46% of all 15-29 year old persons live in a city, followed by 25% that live as nomads. Only 49% of male youth is literate, compared to 41% of female youth. 69% of current youth are not enrolled in school. 3 in 10 youth are unemployed.¹⁴¹ Irregular migration of youth populations in search of resources of livelihoods, particularly from rural to urban areas may compound existing challenges linked to youth vulnerability and unemployment.

¹³⁸Expanding Access to Justice in Somalia Program 2019.

¹³⁹J. Garder and J. El-Bushra, The impact of war on Somali men and its effects on the family, women and children.

¹⁴⁰UNICEF, Child Protection, 2020, accessed at: <https://www.unicef.org/somalia/child-protection>

¹⁴¹ UNFPA, The Somali Youth in Figures, August 2016, accessed at: https://somalia.unfpa.org/sites/default/files/pub-pdf/INFOGRAPHIC_YOUTH%20DAY%20%282%29.pdf

A joint study by the World Bank and the United Nations on youth and attitudes to peace showed that for youth peace is not just about ending violence, but includes strong and accountable institutions providing services and opportunities for all. For many respondents there was also a clear link between violence, including domestic violence, at the local level and national level conflict. Peacebuilding efforts, therefore, must start at home and at the community level.¹⁴²

There are variety of other vulnerable and marginalized groups in Somalia, depending on the location. These include non-pastoralist groups, such as the Bantu population. They are often discriminated against and typically do not participate in large numbers in government or other institutions, and therefore have their voices less represented.

¹⁴² The World Bank, UN Somalia, UN Habitat, Youth as Agents of Peace in Somalia, 2018, p. 10.

4. Environmental and Social Risk Classification

The primary beneficiaries are populations in rural areas, especially those most affected by the infestation, including farmers, agropastoralists, pastoralists, fishers and rural IDPs (displaced due to various factors and living among host communities in rural areas) that benefit from the risk mitigation infrastructures and crisis response activities. Through strengthening of disaster risk management systems and institutions, the project has the potential to benefit the entire Somalia. Whereas project activities are expected to have substantive positive impacts, there are adverse residual risks. Both, environmental and social risk classification for the Project is considered 'High'.

Component 1 of the project will deliver a rapid response to the desert locust crisis through surveillance, ground and aerial spraying operations, activities that pose significant environmental risk. Large-scale control operations of desert locusts can lead to unintended and undesirable consequences. Desert locust is generally found in delicate ecosystems, where they co-exist with people, livestock, vegetation and beneficial insects (e.g. pollinators). Although control operations are targeted at desert locusts and will be conducted by applying the most compatible and safe products, there is always a risk of adverse effects to the environment, local communities and the control teams.

Environmental risks and impacts are also anticipated for activities conducted under component 2 and 3, which will entail small to medium scale civil works, including rehabilitation and reconstruction of community infrastructure (damaged transport infrastructure, municipal water supply and sanitation schemes, water resources and flood risk management infrastructure, restoration of irrigation schemes in support of agrarian livelihoods, damaged schools, and damaged health facilities). These activities will likely generate adverse site-specific risks and impacts such as erosion and sedimentation of rivers from earth works and run-off during the construction phase, disposal and management of large amounts of excavated material generated from construction activities during the construction phase, occupational health and safety of workers both during the construction and operational phases, increased level of dust, noise and vibration from moving of construction vehicles and machinery, and community health and safety risk and pollution of surface and groundwater sources.

Component 3, among other activities, responds to providing support to laboratory capacity for the timely detection of pathogens (including for COVID-19). Activities will include laboratory training, equipment and supplies, staffing, material and guideline development as well as logistics. These activities entail risks related to the handling and disposal of hazardous/medical waste; as well as to limiting the spread of communicable disease (Covid-19) through health provision and small-scale civil works.

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

Project activities associated with key social risks and impacts are mainly connected to the foreseen low-to-medium-intensity civil work activities on reconstruction and rehabilitation of physical and community infrastructure, which includes risks associated with labor rights and management; labor influx and associated risks such as GBV/SEAH; clash for resources and upsetting of delicate community dynamics; displacement impacts resulting from involuntary resettlement, and the use of cash transfers, an intervention susceptible to diversion and leakages.

Further potential social risks and impacts are related to ensuring security for project operations including the protection of project workers, beneficiaries and project-affected persons; exclusion of vulnerable, marginalized and minority members of the community from project benefits due to project investments being rolled out in a context of limited resources against widespread need and amplified by weak formal redress systems and limitations in effective community engagements and participation; elite capture where the project, designed to benefit locations most ravaged by drought, floods and locusts with exclusive targeting of the poor, marginalized and displaced populations for additional interventions gets diverted to ineligible and less-deserving locations and individuals; challenges in access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring; harmful inward migration likely to upset delicate community dynamics caused by the project operating in a small number of sites relative to immense and widespread need; systemic weakness as the capacity of the Government to identify, understand and prevent adverse social impacts on the project is limited. The Project is considered high risk for both, environmental and social aspects, according to ESS1.

Component 6 activities, under the AF, that bear additional environmental risks and impacts, include the rehabilitation of small-scale community irrigation and water supply infrastructure, provision of fishing inputs and infrastructure to coastal communities, rehabilitation and reconstruction of larger drought-mitigating water and irrigation infrastructure, reconstruction of high priority small-scale fish jetties and other landing infrastructure, processing and handling centers. Environmental risks and impacts are not expected to be significant, as investments will involve rehabilitation and reconstruction of existing infrastructure. Risks and impacts could emanate from activities that involve physical works, especially where it is hazardous due to its proximity to the water. The operational phase may have potential effects on the environment as well as health and safety in regards to fish processing and storage facilities.

With the increasing realization that exploitation of marine resources has led to lower productivity and, in some cases, stock collapses, there has generally been an increase in research into risks in fisheries management. Potential risks to fish stocks include fishing methods used by the local community, which threaten the sustainability of the fish stocks in the water body. Additionally, human consumptive demands on fish resources are fundamentally in conflict with the constraint of maintaining a suitably low risk to the resource. To compound the situation, the modern technology provides the motivation, to extract fish biomass at rates much higher than it can be produced, and over time this can deplete fish stocks in the water body. Engagement of the community and industries can be very essential in this respect if growth of fisheries sector is to be achieved.

One critical operational risk requiring interventions at government level is the risk associated with climate change. With climate change there can be multiple changes in marine resources which include parameters such as abundance, movements, distribution and biomass of fisheries, and this may lead to production uncertainty for capture fisheries.

Key social risks of the AF activities include a lack of security for project workers and beneficiaries; exclusion of vulnerable, marginalized and minority members of the communities from project benefits; selection bias and elite capture; challenges in access to beneficiaries for meaningful stakeholder engagement and difficulty in monitoring where harm occurred; sexual exploitation and abuse, sexual harassment and other forms of GBV, especially where women's incomes increase due to fish processing activities; and displacement impacts and restrictions to land use associated with water supply and fishing input infrastructure.

5. Potential Risks and Mitigation Measures / Environmental and Social Management Plan

Potential Risks and Mitigation Measures

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts				
Risks and impacts under ESS 1 relate to general Project activities, including to beneficiary targeting.				
ESS1	Targeting and diversion Project benefits being diverted to ineligible and less-deserving locations and individuals	<ul style="list-style-type: none"> • Use of Floods Impact Needs Assessment (FINA) to guide the selection of project sites for priority investments to address site selection and elite capture concerns • Continuous monitoring of the project to take account of changing dynamics that have implications for risks for manipulation of project • Engagement of high capacity implementation support agencies to support project monitoring • Ensure that selection of beneficiary locations, modes of selection and decision making are widely disseminated among the public (SEP) • Closely monitor the use of project resources through IVA or other monitors • Where physical monitoring is not possible, deploy technological means to monitor the implementation of physical sub projects 	IP	
	Diversion of sub projects. Sub project can be diverted at point of delivery. Given that monitoring in conflict situations can be difficult, there is a likelihood that project resources and sub projects get diverted at different stages of project implementation.		IP, SPTs, MDAs	Monitoring activities and implementation of SEP as part of IP budget GRM activities partly on IP budgets
	Project investments may not reach the truly vulnerable, marginalized and minority members of the community.	<ul style="list-style-type: none"> • Conduct FINA with support from development partners to estimate the extent of damages caused by floods as well as guide priorities for 	IPs, PIU	IVA budget IP budget, including implementation of SEP, rolling out of GRM

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>This is further exacerbated by the nature of some interventions being rolled out such as cash transfers, weaker formal redress systems and limitations in effective community engagements and participation</p>	<p>recovery, including selection of locations for investments.</p> <ul style="list-style-type: none"> • Implement robust stakeholder engagements (see SEP) – especially at the community level - to explain the rationale for selection of sites for investments • Sensitize communities on the availability of a project grievance redress mechanism (GRM) to support the systematic uptake, processing and resolution of project related complaints and grievances (see SEP) 		

Fish Project Activities

Anticipated E&S risks and impacts to emanate from proposed construction of small-scale fish landing, processing and handling sites and rehabilitation and reconstruction of water infrastructure for food insecure communities.	<ul style="list-style-type: none"> • Appropriate mitigation measures for the respective risks and impacts identified for the proposed construction of small scale fish infrastructure are provided under the respective environmental and social safeguards discussed below. The updated frameworks shall be guiding tool to further develop a Site Specific Environmental and Social Management Plan when the project site is known. 	PIU/IP	PIU Budget
Impacts may include; <ul style="list-style-type: none"> h) challenges with the disposal of the construction wastes and materials, i) Impacts on marine and benthic animals and plants 	<ul style="list-style-type: none"> • Additionally, any new risks and impacts under AF associated with labor, security and Gender Based Violence (GBV) should be reflected in updated LMP, Security Management Plan and GBV Response Plan as required • To address insecurity associated with working in rural Somalia, additional stakeholder engagement 		

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	j) disposal and management of large amounts of excavated material generated from construction activities during the construction phase	and community participation should be conducted.		
	k) Erosion and sedimentation of rivers from earth works and run-off during the construction phase			
	l) Occupational health and safety of workers both during the construction and operational phases			
	m) increased level of dust, noise and vibration from moving of construction vehicles and machinery, and community health and safety risk and pollution of surface and groundwater sources			
	n) Insecurity associated with working in rural Somalia which may jeopardise the implementation process of the project.			

•

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Access			
	Access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring will be a challenge, as Project locations are likely to be remote underserved areas with basic physical and community infrastructure devastated by drought and floods.	<ul style="list-style-type: none"> • Involve UNOPS, FAO and other humanitarian and development organizations with valuable knowledge and experience in delivering specialized operations in the target locations to provide relative advantage to challenges of access to site • Monitoring will also be provided by the same high capacity institutions 	IPs	IP budget
	• Inward Migration			
	Risk of population influx from neighboring district and locations, which may upset community dynamics and perpetuate clashes and animosity exacerbating social and environmental fragility	<ul style="list-style-type: none"> • Select priority areas guided by findings and recommendations from FINA • Proper and transparent targeting of vulnerable populations, ensuring inclusion in particular for displaced populations, for cash-based interventions and the small amounts of transfers is seen as a mitigating measure against harmful inward migration 	IPs, SPTs, MDAs	IP budget
	• Systemic Weaknesses			
	Capacity of the borrower to identify, understand and preventing adverse social impacts on the project is limited. This includes capacity for monitoring of impact and	<ul style="list-style-type: none"> • Engage UNOPS, FAO and other humanitarian and development organizations to fill capacity gaps for the application of risk mitigation protocols and monitoring of impacts for social harm. 	UNOPS, FAO	UNOPS/FAO budgets

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	redressing the impacts of social harm where it has occurred.	<ul style="list-style-type: none"> Build the capacity of the borrower in the implementation of risk mitigation measures and the monitoring thereof throughout project implementation 		
• Conflict				
	Conflict and tensions can rise over the selection of locations of new infrastructure	<ul style="list-style-type: none"> Conduct contextual analysis and conflict mapping prior to engagement 		IP budget
	Lack of inclusion can lead to grievances over sub project selection and benefits. There is a risk that some groups are not included in decision making fora and that they do not end up benefitting from the sub projects. This can lead to grievances over the decision-making fora, those in decision-making powers and the sub projects.	<ul style="list-style-type: none"> Implement and monitor GRM 		IP budget – roll out of GRM; PIU budget on GRM
	Conflict risks due to deployment of contractors	<ul style="list-style-type: none"> Implementation of contractor management procedures (see Annex 5) 		IP / PIU budget
Technical Assistance and Studies				
	Feasibility studies, technical design, policies, plans and strategies developed or conducted may have	<ul style="list-style-type: none"> Integrate E&S objectives into TA process Promote transparency through stakeholder participation and public information disclosure 	PIU / IP	PIU / IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	significant E&S impacts Studies implemented by IPs are not consistent with the ESSs	<ul style="list-style-type: none"> • TORs for studies supported by IPs must be consistent with the relevant requirements of the ESSs and subject to prior review by the World Bank 	PIU/IP	IP budget
	<ul style="list-style-type: none"> • ESS 2: Labor and Working Conditions <p>Nearly all activities will require some type of project workers. Component 1 includes community-based labour, such as for debris removal, replanting of vegetation, collecting of debris materials for reconstruction, and other cash for work activities. Component 2 further includes skilled labour, including through contractors, for the rehabilitation and reconstruction of critical community infrastructure; community-led rehabilitation of communal water and sanitation systems; flood mitigation works; community-led restoration of damaged irrigation schemes; Fisheries Sub-Project; rehabilitation and re-equipment of damaged primary and secondary schools; rehabilitation and re-equipment of damaged primary and secondary health facilities (for a detailed definition of workers see annex 6).</p>			
ESS 2	<p>Security of all Project workers</p> <p>Risks of child and forced labor</p> <p>Lack of occupational health and safety (OHS) for workers deployed at construction sites. Field officers directly involved in spraying operations may be exposed to insecticides and run the risk of being poisoned. Other field staff can also be exposed, either accidentally or</p>	<ul style="list-style-type: none"> • Implement and monitor Security Management Plan (SMP) • Ensure that labor for the project will be sourced and managed responsibly including the set-up of a workers' GRM, which includes reporting channels that enable safe and confidential reporting channels and protocols for reporting cases of sexual harassment. • Provide necessary personal protective equipment (PPE) to all field officers directly involved in spraying. • Training on use of PPE • Implement procedure of dealing with accidents and exposures 	IPs, PIU IP, PIU IP	Staff costs, costs of security personnel 1,000,000 USD (?) Staff costs Construction budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>during the normal course of their work based on task assigned or a number of tasks</p> <p>Delayed payment of workers or community workers leading to complaints and conflict</p> <p>Underpayment of contracted workers or supply workers</p> <p>Labor and working conditions of community workers don't comply with WB and Somali legislation – including occupational health and safety risks.</p> <p>Poor working conditions: unsafe work environment</p>	<ul style="list-style-type: none"> • Implement and monitor LMP 	IP, PIU	Staff Costs
	<p>Labor standards are not in accordance to national laws and international standards</p> <p>Poor working conditions: lack of workers' rights</p> <p>Discrimination against women in employment</p> <p>Labor influx leads to increase of GBV cases</p>	<ul style="list-style-type: none"> • Implement and monitor the LMP (see annex 6) • Develop and implement OHS Plan for workers • Conduct regular supervision of construction works to identify potential OHS risks and compliance with OHS plan • Conduct regular supervision of construction works to identify potential OHS risks and compliance with OHS plan 	IP, PIU	Staff Costs
		<ul style="list-style-type: none"> • Implement and monitor the LMP (see annex 6) • Set-up and operate a Labor specific GRM for workers, as per LMP • Implement and monitor GBV Action Plan 	IP, PIU	Staff Costs
				GBV Action Plan budget: 1,000,0000 USD ¹⁴³

¹⁴³ This includes grants for NGOs to provide referral systems where they don't exist and other investments in the GBV system

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Delayed payments / cash transfers may lead to complaints and conflicts	<ul style="list-style-type: none"> • Timely payment • Communication / awareness campaign of payment mechanisms 	IP, PIU	Staff Costs
	Covid-19 infection risks for workers at site	<ul style="list-style-type: none"> • Follow specific Covid-19 guidelines for workers at construction site (see Annex 15) 	IP	IP budget
	Workers coming from infected areas			
	Co-workers becoming infected			
	Workers introducing infection into community/general public			
	Risk of spreading the infection among the workforce and the medical personnel.	<ul style="list-style-type: none"> • Assuring proper and quick access to appropriate and timely medical services, • Educate hand hygiene and PPEs, that is not based on ability to pay or other factors; and • Anticipate and address issues resulting from people being kept in quarantine. 		
	Workers denied the opportunity to complain they do not have adequate PPE to protect themselves against COVID 19	<ul style="list-style-type: none"> • Grievance Mechanism in place 		
	Risk of the spread of the pandemic among health professionals	<ul style="list-style-type: none"> • Ensure appropriate training on Infectious Prevention and Control for healthcare workers and other staff. • Plan for surge capacity, estimate the needs in terms of patient beds, respiratory support, PPE, staff and diagnostics. Laboratory capacity and therapeutics should also be included in these estimates • 	IP in collaboration with PIU and MoH	

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
		<ul style="list-style-type: none"> Consider restricting non-essential visits and ensure that everyone, including patients and visitors, at the healthcare facility are aware of the need for hand and respiratory hygiene, including suitable cough etiquette Ensure training in Health care waste management systems, which enable health care waste to be managed responsibly, without harming the community or the environment. Staff engaged in waste management should wear PPE. Waste should be treated as infectious clinical waste Category B (UN3291) [30] and handled in accordance with healthcare facility policies and local regulations. 		
	Occupational health and safety risks and hazards associated with fish processing and storage facilities	<ul style="list-style-type: none"> Follow OHS guidelines set out in General EHSGs and EHSGs for Fish Processing. LMP and OHS Plan to reflect the necessary policies and procedures for risk assessment and management. 	PIU/IP	

• **ESS 3: Resource Efficiency and Pollution Prevention and Management**

ESS 3 is relevant for all activities in connection with ecosystem services and the environment; as well as activities that involve civil works.

Locust control				
Pesticides used may cause surface and ground water pollution, leading to potential (temporary) reduced availability of drinking-water. Pesticides can get into water through accidental spillage	<ul style="list-style-type: none"> Implement and monitor PMP Apply pesticides only in areas where this is needed and with the recommended dosage. During application of this pesticide, ensure precautionary measures are adhered to as guided by the Material Safety Data Sheet of the pesticide in use, 	FAO, PIU	Costs covered in PMP	

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	during use or transport, washing of spray equipments after spray operation and aerial spray.			
• General Civil Works				
ESS 3	Generation of solid waste,	<ul style="list-style-type: none"> Appropriate designated areas for disposal of solid waste shall be identified in consistent with the local and international requirements. 	IP	IP budget
	Generation of dust and noise,			
	Pollution from construction wastes and water use	<ul style="list-style-type: none"> Resource efficiency pollution control measures will be analyzed and incorporated as part of CESMPs 	IP	IP budget
	Erosion and sedimentation of rivers from earth works and run-off during the construction phase	<ul style="list-style-type: none"> Where feasible, practice minimal or none vegetation disturbance during the implementation of the project, avoid exposing the soils to external weather conditions. 		
	Disposal and management of large amounts of excavated material generated from construction activities during the construction phase	<ul style="list-style-type: none"> Should the project utilize raw materials for construction activities, the material will be sourced through measures specified in Good International Industry Practices (GIIPs). 		
	Increased levels of vibration from moving of construction vehicles and machinery	<ul style="list-style-type: none"> Routine maintenance of the vehicles to reduce the vibrations and air emissions Selecting equipment with lower sound power levels Installing suitable mufflers on engine exhausts and compressor components 		

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
		<ul style="list-style-type: none"> • Installing acoustic enclosures for equipment casing • Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance. 		
	Conflict with the community's use of the proposed source of raw materials or degradation of community resources	<ul style="list-style-type: none"> • Ensure thorough consultations are made with the local community leadership and the local authorities on the proposed site as point source for the raw materials 		
	Hazardous waste from paint containers, cleaners, etc. and waste petroleum products (e.g., oil, grease, etc.) and batteries	Hazardous waste management procedures implemented	IP	IP budget
	Droughts and floods may have potential impacts and risks and may warrant modification of certain mitigation measures	Procedure to deal with construction during drought and flood events (similar to emergency procedure) as	IP	IP Budget
<ul style="list-style-type: none"> • Desiliting of weirs / boreholes / springs / sanitation systems / irrigation schemes / rehabilitation of facilities 				
	Soil Erosion during desilting of weirs/dams and reinforcement of river banks	<ul style="list-style-type: none"> • Implement soil control measures 	IP, PIU	Staff costs, IP budget
	Water contamination from oil spills during works.	<ul style="list-style-type: none"> • Implement water pollution control measures 		

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>Disturbance of flora and fauna (terrestrial and aquatic) during construction of piped water schemes</p> <p>Irrigation water with high Total Dissolved Solids (TDS) may lead to salinization of the soils. Acceptable limit is 1,500 ppm.</p> <p>Potential groundwater depletion due to increase in ground water withdrawals</p>	<ul style="list-style-type: none"> Implement measures to protect against disturbance of flora and fauna Conduct analysis of irrigation water to ensure water with TDS above 1,500ppm is not used for irrigation. Ensure water balance is determined which will guide on the amount of water to be abstracted, and subsequently eradicating uncontrolled water abstraction by the relevant authorities such as the local council 	IP working in collaboration with local council	IP budget
	<p>Shallow water table is commonly contaminated with coliforms, fecal coliforms, fluorides, and nitrate. These contaminants can cause moderate to high significance health impacts on the communities</p>	<ul style="list-style-type: none"> All open wells must have a parapet wall. Preferably cover the well with an appropriate roofing structure to avoid contaminants in the well for this reason, and to minimize instances of people/animals falling into the well Method of drawing water from open wells should not be labor intensive. Community groups to receive guidance on hygiene practices in and around the water point to avoid potential contamination of the water sources. 	IP	IP budget
	<p>• Health Care provision</p> <p>Health care waste risks leading to contamination through medical waste that is not properly disposed (infections, pollution/contamination of the</p>	<ul style="list-style-type: none"> Implement and monitor health care waste management procedures based on <i>WBG Environmental, Health, and Safety General Guidelines</i>, including training of health care workers and auxiliary staff on how to safely 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	environment – air, land, water physical injuries, effect on domestic animals)	<p>handle health care waste up to final disposal of the same</p> <ul style="list-style-type: none"> Provide adequate and appropriate protective clothing; use appropriate types of polythene bags and containers for waste; appropriate storage of health care waste until end of day; treat health care waste appropriately at hospitals, etc....). 		
	Risks of water borne diseases for health care facilities with inadequate portable water	Prove adequate portable water at the affected health care facility, as this is critical to achieve acceptable public health/hygienic conditions.		
	Risks of handling and disposal of hazardous/medical waste (Covid-19)	<ul style="list-style-type: none"> Follow infectious and medical waste management plan (see annex 14) Ensure incineration of all the delivered hazardous waste and appropriate disposal of the resulting ash at a landfill. 	IP	IP budget
	Poor management of healthcare waste leading to contamination of the environment	<ul style="list-style-type: none"> Conduct due diligence to examine its technical adequacy, process capacity, performance record, and operator's capacity. In case any gaps are discovered, corrective measures are recommended and implemented 	IP working in collaboration with MoH representative	IP budget
	Inadequate facilities and processes for treatment of waste	<ul style="list-style-type: none"> Estimate potential waste streams Consider the capacity of existing facilities, and plan to increase capacity, if necessary, through construction, expansion etc. Specify that the design of the facility considers the collection, segregation, transport and treatment of the anticipated volumes and types of healthcare wastes 	IP working in collaboration with local council	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Use of incinerators results in emission of dioxins, furans and particulate matter	<ul style="list-style-type: none"> Require that receptacles for waste should be sized appropriately for the waste volumes generated, and color coded and labeled according to the types of waste to be deposited. Develop appropriate protocols for the collection of waste and transportation to storage/disposal areas in accordance with WHO guidance. Design training for staff in the segregation of wastes at the time of use 		
	Risk of infection	<ul style="list-style-type: none"> Where possible avoid the use of incinerators If small-scale incineration is the only option, this should be done using best practices, and plans should be in place to transition to alternative treatment as soon as practicable (such as steam treatment prior to disposal with sterile/non-infectious shredded waste and disposed of in suitable waste facilities) Do not use single-chamber, drum and brick incinerators If small-scale incinerators are used, adopt best practices to minimize operational impacts. 	IP working in collaboration with Ministry of Health	IP budget
	Risk of getting spoiled sample	<ul style="list-style-type: none"> A specimen received by the laboratory must be accompanied by sufficient information to identify what it is, when and where it was taken or prepared, and which tests and/or procedures (if any) are to be performed. Specimens must be stored in containers with adequate strength, integrity, and volume to contain the specimen, and that 	Ministry of Health, IP representative	IP budget monitored by IP representative

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>Waste segregation, packaging, color coding and labeling - Risk of infection to the handlers (specimen)</p> <p>Onsite collection and transport</p> <ul style="list-style-type: none"> - Risk of infection to the handlers due to secondary handling <p>Waste transportation to and disposal in offsite treatment and disposal facilities - Entails the carriage of healthcare waste through public streets which can be a risk in case of an accident or mare spill of health care waste</p>	<ul style="list-style-type: none"> are leakproof when the cap or stopper is correctly applied. • Use plastic containers for storage whenever possible that are free of any biological material on the outside of the packaging. • Correctly label containers, marked and recorded to facilitate identification, and made of an appropriate material for the type of storage required • Segregate medical/health care waste at generation point • Place the different types of medical/health care waste in secured bags colour coded and labelled • Routing and scheduling can be figured out by trial-and-error or by heuristic routing approaches which take into account traffic patterns at different times of day, street configurations, on which side of the road the majority of facilities are situated, ground • Ensure a waste tracking system as part of a cradle-to-grave approach to waste management and in keeping with the “duty of care” principle is put in place 	<p>Ministry of Health Officer, working in collaboration with IP representative</p> <p>Ministry of Health Officer, working in collaboration with IP representative</p> <p>IP in consultation with the local authority</p>	<p>MoH budget</p> <p>MoH budget</p> <p>IP budget</p>

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<ul style="list-style-type: none"> Sanitation <p>The pit latrines and septic tanks if not well sited and maintained will be a source of foul smell that will affect those within the area and eventually source of groundwater contamination. Faecal matter may lead to underground water contamination if the water table is high or in the case of pit latrines, when there is an overflow due to heavy rains. Contamination of water may lead to outbreak of diseases e.g. cholera, dysentery, typhoid, diarrhoea etc. Pit latrines can also be breeding grounds for flies and mosquitoes which are disease vectors. Super structures if poorly constructed and designed could lead to hazards including falling into the pit if the super structure floor/slab gives ways. This can lead to injury or loss of life.</p>	<ul style="list-style-type: none"> Ensure proper siting of septic tanks and pit latrines in accordance with the MOH guidelines for siting and construction of pit latrines Ensure the number of latrines and septic tanks not lined with concrete or HDPE liner are guided by the population in the area. Taking ratio of latrines to population to a minimum of one latrine to 50 persons for communal ones, this guideline will regulate the no. of latrines in an area. The sphere project recommends ration of 1:20 (one latrine to 20 persons¹⁴⁴) 	IP	IP budget
		<ul style="list-style-type: none"> Ensure proper maintenance of sanitation facilities including cleaning and hygiene training 	IP	IP budget
		<ul style="list-style-type: none"> Ensure super structures are well constructed including the slab with the required strength 	IP	IP budget

¹⁴⁴ The Sphere Project, 2011, Humanitarian Charter and Minimum Standards in Humanitarian Response

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Common pests attracted to dirty environment are rats, cockroaches, flies. These animals are also disease vectors. They transport germs from the toilet to nearby human settlement.	<ul style="list-style-type: none"> Provide hand washing facilities and water in all the sanitation infrastructures Ensure proper cleaning of toilets Ensure and provide training on cleaning of toilet Use biopesticides to manage pests 	IP	IP budget
	<ul style="list-style-type: none"> Discharge of Waste <p>Generation of a wide range of waste effluents (waste water from washing and cleaning operations, oils and oily water generated by machinery maintenance, leaked/spilled fuels and oils, waste effluent discharges from the processing operation, animal wastes, and others)</p>	<ul style="list-style-type: none"> Design activities employing technologies that are least polluting; Carry out treating and recycling of waste effluents as far as possible and practical before safely being discharged in designated areas or reused 	IP	IP budget
	Uncontrolled discharges of these wastes and other effluents can potentially contaminate the soil, pollute the nearby water bodies and degrade their value for communities and ecology	<ul style="list-style-type: none"> Ensure that waste is not released into any drinking water source, cultivation fields, or critical habitat 	IP	IP budget
	These discharges can potentially affect the soil fertility, pollute the drinking	<ul style="list-style-type: none"> Waste effluents will be not be released in irrigation channels 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	water sources, contaminate irrigation water thus affecting the crops, and thus negatively affecting the ecology of the area including natural flora and fauna.			
	Wastewater/runoff from cultivation activities may contaminate water for fisheries	<ul style="list-style-type: none"> • Ensure the following <ul style="list-style-type: none"> (i) protection and conservation of vulnerable habitats; (ii) soil and water conservation practices such as afforestation, agro-forestry programmes, terracing, grass planting etc. to minimize run-offs; (iii) formulation of by-laws by the water users associations of each of the sites; (iv) public education and sensitization to create awareness and sensitivity towards environmental management; • Ensure treatment of the generated waste water before this is discharged into the open environment 	IP	IP budget
	Generation of large amounts of waste water, primarily for washing and cleaning purposes at the fishing processing plant. The process generally requires large amounts of water for washing and cleaning purposes, but also as media for storage and refrigeration of fish products before and during processing		IP	IP Budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
• Solid Waste				
	Generation of solid wastes (including human and animal secreta, wastage from packing operations and others)	<ul style="list-style-type: none"> Minimize use of non-biodegradable substances (e.g. for packaging) Minimize generation and Recycle solid waste as far as possible and practical Adopt composting of biodegradable waste if practicable Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, cultivation fields, irrigation channels, natural drainage paths, wetlands and critical habitat, the existing waste management system in the area, local routes, and general aesthetic value of the area Ensure the protection of disposal areas 	IP	IP budget
	Inappropriate disposal of the waste can potentially have negative environment and ecosystem impacts in the area, while also contaminating soil and water	<ul style="list-style-type: none"> Ensure that disposal of waste will not be a danger to children Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal 		
	Inappropriate disposal of the following under fish sub-project activities;	<ul style="list-style-type: none"> Ensure the generated solid waste is disposed at designated site approved by the relevant authorities 		

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>a) Generated solid waste from the construction of fish infrastructure</p> <p>b) Large quantities of organic waste and by products from inedible fish parts during the fish processing activities</p> <p>]</p> <p>Rehabilitation of larger irrigation schemes and fish processing activities can lead to water pollution</p>	<ul style="list-style-type: none"> Ensure consultations with the local authority and other relevant government agencies for appropriate disposal of organic waste and fish by-products Conduct hydrologic analysis (quality and quantity) or water balance. Extraction rates and locations to take into account the availability of water for personal hygiene needs, seasonal variability and projected changes in demand in the sub-project area. Comply with general EHSGs, EHSGs for Fish Processing, and EHSGs for Water and Sanitation 		
	Construction of roads			
	Construction of roads can lead to serious land erosion and landslides	<ul style="list-style-type: none"> Up and down stream slope stabilization, planting of thick vegetation, use of lightweight rollers or other manual means of compaction 		IP budget
ESS 4: Community Health and Safety	<p>ESS 4 is relevant for activities around locust control, labor used for civil works activities, cash transfers and cash for work, community infrastructure works, debris removal, water and irrigation schemes and sanitation.</p> <ul style="list-style-type: none"> Locust Control 			
	Settlements nearby spray area may be affected by activities around pesticide storage, accidental spillage,	<ul style="list-style-type: none"> Implementation and monitoring of PMP 	FAO, PIU	Cost covered in PMP

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	contaminated equipment, overspraying, entry into sprayed area and exposure to empty pesticide containers	<ul style="list-style-type: none"> Informing of inhabitants of the zone in which the treatments take place of the operation beforehand, warnings not to come close 		
	Pollution of communal drinking water due to insecticides	<ul style="list-style-type: none"> Selection of the right insecticide for a given situation or environment, using the appropriate control strategy and method, and strictly applying environmental protection measures where possible 	FAO/IP	Cost covered in PMP
	Community health and safety risks through exposure to pesticide through potential involvement in Desert Locust control (help localize spray targets) or through consumption of contaminated food grown in sprayed areas	<ul style="list-style-type: none"> Control teams ensure that nobody is present in the area to be sprayed Robust information dissemination on the timing and mode of spraying to ensure the community can be protected as appropriate Support the sheltering and protection of vulnerable members of the community from harful effects of spraying 		
	Livestock will graze on green pastures just like locusts and insecticide residues can end up in meat and milk after locust control operations.	<ul style="list-style-type: none"> Villages or habitations, open water and nature reserves will be off limits for all insecticide treatments against locusts. Wells or waterholes that lie in the area in which treatments take place will be covered up. Beehives will also be covered up temporarily to protect them further from any unexpected spray drift. 		
	• Labour influx			
	Increased GBV/SEAH cases	<ul style="list-style-type: none"> Impacts of labor influx driven by the small- medium scale infrastructure works will be managed by the LMP, including a code of conduct for project workers 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Spread of communicable diseases (SII, HIV/AIDS etc..)	<ul style="list-style-type: none"> Implementation and monitoring of GBV / SEA Action Plan Community awareness sessions on communicable diseases 		
	<ul style="list-style-type: none"> Security <p>Security risks for all project workers, communities, beneficiaries and other project-affected parties largely characterized by a dire humanitarian situation due to multiple and simultaneous crises afflicting the country compounded by weak and developing government systems</p> <p>Provision of cash support for affected households, cash for work and unconditional cash transfers raise the profile for targets by opportunistic armed actors in a context of recent history of relative lawlessness and the potential for increased conflict.</p>	<ul style="list-style-type: none"> Partner these organizations with local NGOs that have a good understanding of local dynamics an important factor in managing exposure to security threats Implementation of the Security Management Plan (SMP) 	IP / PIU	IP budget / SMP budget
		<ul style="list-style-type: none"> Involve UNOPS and other humanitarian and development organizations with valuable knowledge and experience in delivering specialized operations in the target locations and provide relative advantage to challenges of access to site and the identification and mitigation of security threats to project operations 	IP	IP budget
	<ul style="list-style-type: none"> Harmful Inward migration <p>Harmful inward migration as the project will mainly operate in a small number of sites relative to immense and widespread need, possibility of</p>	<ul style="list-style-type: none"> Selection of priority areas guided by findings and recommendations from FINA 	IP, SPTs, MDAs, PIU	Staff costs

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>population influx from neighboring district and locations</p> <p>Upsetting of community dynamics and perpetuated clashes and animosity exacerbating social and environmental fragility</p>	<ul style="list-style-type: none"> Proper and transparent targeting of vulnerable populations, ensuring inclusion in particular for displaced populations, for cash-based interventions and the small amounts of transfers is seen as a mitigating measure against harmful inward migration 	IP, SPTs, MDAs, PIU	Staff costs
	<p>• GBV Risks</p> <p>Potential risks of gender-based violence increase with the receipt of cash transfers by women and children (within households or at payment points)</p> <p>Risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors, extending from registration or release of funds</p> <p>Increased GBV risks based on the design and location of infrastructure, maybe designed without taking into account women and girls safety considerations (privacy, location), dignity (privacy and women's requirements for use) and accessibility (no ramps etc) to facilitate access for persons with disabilities.</p>	<ul style="list-style-type: none"> Implement and monitor GBV/SEAH Child Protection Prevention and Response Plan Action Plan Engage a dedicated GBV specialist to support PIU oversight and management of these risks Ensure design of infrastructure meets the needs of all women and girls, including safety, accessibility (based on universal design) and dignity Safety audits will be developed for all relevant activities to ensure protection and security of affected communities and alignment with global protection standards TPM to monitor implementation of GBV risk management activities 	IP, PIU	IP budget, GBV Action Plan budget
				Staff costs, GBV service provider: 500,000
				IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<ul style="list-style-type: none"> Community Infrastructure 			
	Exposure of community members to physical hazards on project sites	<ul style="list-style-type: none"> Undertake safety precautions to address safety hazards for the nearby community, including, safety/warning signage, safety barrier around the construction site, and safe driving practices 	IP	IP budget
	Traffic and road safety hazards	<ul style="list-style-type: none"> Informing public about potential construction risks 		
	Health issues including water-borne and vector borne diseases resulting from poor site management such as stagnant water	<ul style="list-style-type: none"> Simplified E&S construction checklists to be included in the civil works contracts, as part of C-ESMP Ensure good house keeping at every work sites 	IP	IP budget
	<ul style="list-style-type: none"> Debris Removal 			
	Removal of debris affects new location aesthetically		IP	IP budget
	Debris removal poses a safety risk for the community at the new location	<ul style="list-style-type: none"> Implement and monitor waste management procedures based on <i>World Bank Group Environmental, Health, and Safety General Guidelines</i> 		
	<ul style="list-style-type: none"> Water and irrigation schemes 			
	Health impacts on communities through contamination of open wells (with coliforms, fecal coliforms, fluorides, and nitrate)	<ul style="list-style-type: none"> Community groups to receive guidance on hygiene practices in and around the water point to avoid potential contamination of the water sources 	IP	IP budget
	Lack of community ownership hampers operation and maintenance of water	<ul style="list-style-type: none"> Site selection to be based on community engagement for the protection of these sites, in 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	infrastructure and its long-term	<p>order to ensure community ownership from the onset</p> <ul style="list-style-type: none"> • Ensure that the sites of these projects will not pose a danger to children and will be properly fenced with messages shared to the community on maintaining the safety • Ensure that there will be no risks to women and girls from accessing these facilities • Ensure that these points are designed in such a way that promotes accessibility to people with disabilities 		
	Sustainability of water infrastructure will be hampered should systems be built without considerations for how systems are managed, ran and financed in the future	<ul style="list-style-type: none"> • Ensure that for each water point constructed, a community group is set up, with the sole purpose of operating, maintaining and managing the overall system 	IP	IP budget
	<ul style="list-style-type: none"> • Sanitation schemes 			
	Latrines have the possibilities of spread and contact of pathogens and other pollutants with the humans at the household level	<ul style="list-style-type: none"> • Train communities on better hygienic and sanitation practices (e.g. washing hands with soap after defecation, no open defecation in and outside house) as well as on maintenance and cleanliness practices (e.g. daily or twice a day cleaning of latrine). • Make gender marking for men/women clearly visible • Whenever drains will be improved or lined then these must be converted into covered drains • Provide alternative drainage system during construction of drains to reduce the 	IP	IP budget
	In open drains the possibility of human-pollution contact remain high, these drains only serve the purpose of			

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>conveyance, and throughout conveyance human-pollution interaction remain active. This interaction causes serious negative impacts on the community health</p> <p>Latrine usage and maintenance can be at risk should communities fail to recognize the health benefits linked to such technology</p> <p>Proliferation of vectors which increase the risk of epidemic outbreaks</p>	<p>inconvenience to the community and reduce the possibility of human-pollution interaction</p> <ul style="list-style-type: none"> • Mechanisms exist for community to bring forth any complaints/feedback concerning the construction, use and maintenance of these facilities • Locate facilities in a location that is safe for women, girls and young children to use without risks to safety and security • Construct facilities in a manner that will be accessible to children and persons with disabilities • Provide training for management and control of vectors to minimize the epidemic outbreak risk • Provide training to participants for the operation and maintenance of the sanitation facilities (the training should include the identification of risks and mitigation measures) • Conventional or flush latrines should be linked with P-traps • Training of participants on the operation and maintenance of the sanitation facilities to ensure reduced air pollution, among others. 		
	<p>• Health facilities</p> <p>Health facilities due to poor working practices are one of the important sources of spread of different diseases in the community. Most important poor practices are:</p>	<ul style="list-style-type: none"> • Provide equipment for used needles and syringes crushing, and instruct management to practice the crushing of used needles and syringes • Provide training for management and control of health waste 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	improper sterilization of equipment, reuse of used needles & syringes, and unsafe disposal of hazardous waste	<ul style="list-style-type: none"> • Ensure good house keeping 		
	Health waste can be a serious human hazard	<ul style="list-style-type: none"> • Safely dispose hazardous waste generated by health facility by providing disposal pit located within the facility. Lined and covered pit is constructed with a capacity to accommodate six months to one-year hazardous waste. The pit should be designed in manner that it is sealed and only a small hole with a cap is available for disposing and compacting the hazardous waste. Once the pit is full to its capacity, then it is completely sealed and a new pit is constructed within the premises. • For every three health projects, one incinerator shall be built at one of the health projects to ensure safe disposal of health care waste 	IP	IP budget
	Design, construction and operation of infrastructure can pose a safety risk for third parties and affected communities	<ul style="list-style-type: none"> • Structural elements to be designed and constructed by competent professionals and certified and approved by competent professionals 	IP	IP budget
	Public's potential exposure to operational accidents or natural hazards	<ul style="list-style-type: none"> • Where the project involves provision of services to communities, establish and implement appropriate quality management systems to anticipate and minimize risks and impacts that such services may have on community health and safety. In such circumstances, also apply the concept of 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
		universal access, where technically and financially feasible.		
	Occurrence of emergency events (natural and man-made hazards, e.g. fire, explosion, leaks or spills...)	<ul style="list-style-type: none"> Design measures to address emergency event in a coordinated and expeditious manner to prevent injuries, H&E of the community and minimize impacts Conduct risk hazard assessment (RHA) as part of ESMP/ESIA 	IP	IP budget
	Health and safety risks associated with fish processing and storage facilities	<ul style="list-style-type: none"> Follow GIIP guidelines set out in the EHSGs for fish processing 	IP	IP Budget
	Increased risk of GBV cases (including IPV) in community and at workplace, since activities in the fishing sector will directly benefit and likely empower women with improved livelihoods opportunities and decision-making power.	<ul style="list-style-type: none"> Implement GBV Action Plan in AF activity locations 	IP	IP Budget
	Dam safety issues	<ul style="list-style-type: none"> Conduct study of critical water management infrastructure or dam safety assessment and undertake necessary actions 	PIU	Assessment costs: 100,000 USD
<p>• ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</p> <p>ESS 5 is relevant for the reconstruction and rehabilitation of affected basic social and physical infrastructure.</p>				
ESS 5	Key public amenities may have been converted to formal and informal camps for accommodating persons displaced by the conflict, which	<ul style="list-style-type: none"> Implementation and monitoring of IP / PIU Resettlement Plan (RAP) If trees are to be cut for any subprojects, the farmer/beneficiary will carry out compensatory 	IP / PIU	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>will necessitate the relocation of already displaced people</p> <p>Loss of assets, sources of income, or means of livelihoods</p> <p>With weaker or nonexistent formal land administration authorities, processes for land expropriation compensation may not be in place or fully established. As a result, resettlement as well due diligence for establishing ownership for voluntary land donations may be challenging</p> <p>Disputes over land ownership</p> <p>Blocked access to people in the area</p>	<p>plantation of appropriate indigenous tree species. Trees thus planted will be at least four times the number of trees felled for establishing the subproject.</p> <ul style="list-style-type: none"> Implementation of E&S screening processes that exclude project activities leading to massive displacement impacts Community consultations to be conducted IP before establishing facilities (SEP) Implement and monitor GRM Ensure that the local routes, drainage and community access are not blocked by such schemes Implementation and monitoring of IP / PIU Resettlement Action Plan (RAP) 		
	Road construction and/or expansion/upgrade of fisheries activities reconstruction of high priority small-scale fish jetties and other landing infrastructure, processing and handling centers might require acquisition of land, houses, buildings and other physical infrastructure		IP	IP budget
			IP	IP budget
			IP / PIU	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>Encroachment on private and public land: Sub project activities may require land that is possibly claimed or owned by someone.</p> <p>Firming up conflict over land ownership by making people need to claim land rather than share. Sub projects may require land, which may lead to individuals making land claim to proof land ownership prior to sub project commencement – in the hope of reimbursement, for example. This may foster conflicts over local land use, tenure and ownership, and also contradict encouragement of communities to share land</p> <p>Risks arising from displacement impacts and restrictions to land use associated with water supply and fishing infrastructure</p>	<ul style="list-style-type: none"> Inform the concerned communities about detailed activity plan including alternate route during construction, secure community consent, and implement all the safeguards agreed with the community 	IP	IP budget
		<ul style="list-style-type: none"> Relocation or displacement of people should be avoided to the greatest extent. However, once determined that the fish project shall lead to a loss of assets, sources of income, or means of livelihoods, the Resettlement Planning Framework (RPF) already will be strengthened to ensure security of tenure where the development of Resettlement Action Plans (RAP) is required. The Livelihood Restoration Plan updated to reflect this impact and to form part of the RAP. 		

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources ESS 6 is relevant for activities in regards to locust control and civil works.				
ESS 6	<ul style="list-style-type: none"> Locust control <p>The locust crisis intervention support through spraying may affect important natural resources or ecological functions on which local populations depend (e.g. bees provide honey, wax and the essential pollination of many crops but they are also very susceptible to insecticides. Many wasps, flies, spiders and beetles prey on crop pests; if these natural enemies are killed by insecticides, pests may become a problem for farmers)</p>	<ul style="list-style-type: none"> Implement and monitor PMP Restrict use of obsolete pesticide stocks in the country During campaign planning all areas in the country will be identified that are ecologically and agronomically important or particularly sensitive to insecticides. For each sensitive area, locust management options will be evaluated, based on the type of organisms at risk and the likely locust targets that may appear in the area. Subsequently, appropriate locust control techniques will be identified for each area. These include the decision to allow chemical control or not, the choice of acceptable insecticides, periods when treatments are or are not allowed, appropriate control methods, etc. Sensitive areas will be mapped with overlays of previous (or newly expected) locust infestations 	FAO / PIU	Cost covered in PMP
	<ul style="list-style-type: none"> Other <p>Sensitive areas may be impacted by project activities</p>	<ul style="list-style-type: none"> Screening process will identify potential impacts on sensitive areas Avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas, implement RPF 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	<p>Changes in land form and habitat, habitat fragmentation, blockage of migration paths, water consumption and contamination</p> <p>Loss of precious ecological assets, if sub-projects are inappropriately located they could cause secondary encroachment into historical/cultural buildings/areas, disrupt hydrology of natural waterways, regional flooding, and drainage hazards</p> <p>Disturbance of natural habitats at clearing and construction of fish infrastructure.</p>	<ul style="list-style-type: none"> Site selection will include an analysis of the immediate area in terms of population, buildings, slope, nearby wadis/seasonal water flows, and will exclude those which may be adjacent to areas with environmental sensitivities Restore and landscape any affected areas No or minimized removal of flora or wildlife in protected or sensitive areas shall be allowed Ban use of firewood for fuel on any construction camps or areas Ban hunting and game consumption on construction site and all construction workers Limit plant removal to grasses, weeds or small bushes For any plant removal or tree felling, four replacement plants should be replanted Survey the sub-project area before any works, to identify, categorize, and delineate natural and modified habitats and ascertain their biodiversity importance at the national or regional level Ensure that the area to be used for construction of relevant infrastructure does 	IP	IP budget
			IP	IP budget
			IP	IP Budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
		not represent a habitat that is unique or protected (such as mangrove areas), or includes high biodiversity value, such as known sites of critically endangered or endangered species.		
	Unregulated Fishing: Lack of management of coastal fisheries may lead to further unregulated fishing and impacts such as overfishing	<ul style="list-style-type: none"> Provide training to fishing communities on sustainable fishing practices Fishers to sign Code of Conduct for Responsible Fisheries, setting out good practices for governments and fishers. 	IP	IP Budget
	Decline of fish stocks/fish species	<ul style="list-style-type: none"> Ensure effective community engagement and fishermen and discuss fishing methods among other parameters, in the quest to manage fish stocks in the water bodies Take precautionary approach. Provide training to fishers, Conduct data analysis and surveys on fish stocks based on existing biodiversity information Set harvesting limits as appropriate 	IP	
ESS 8	<ul style="list-style-type: none"> ESS 8: Cultural Heritage <p>ESS 8 is relevant for all types of civil works.</p>			
	There is the potential for chance find of cultural or archeological significance during construction that could potentially be impacted from the construction	<ul style="list-style-type: none"> See Chance Find Procedures in annex 2 	IP	IP budget

ESS	E&S Risks and Impacts	Mitigation Measures	Implementing entity	Budget
	Civil work activities could impact intangible cultural heritage (e.g. disruption of religious/cultural festivals, impacts on burial grounds etc..)			
	<p>• ESS 10: Stakeholder Engagement and Information Disclosure</p> <p>Risks and impacts under ESS 10 relate to all Project activities.</p>			
ESS 10	<p>Inadequate, ineffective and inappropriate stakeholder and community engagements and disclosure of information can lead to the exclusion of truly vulnerable, marginalized and minority members of the community from project benefits, amplified by the context of limited resources against widespread need</p> <p>Project benefits are diverted to less-deserving individuals</p> <p>Poor access to beneficiaries lead to less meaningful community engagements and difficulty in monitoring for social harm</p> <p>Covid restrictions pose challenges to community engagements</p>	<ul style="list-style-type: none"> Implementation and monitoring of SEP Conduct additional stakeholder consultations for the AF considering vulnerable households in farming communities and remote coastal fishing communities. <ul style="list-style-type: none"> Implementation and monitoring of GRM <ul style="list-style-type: none"> Implement WB guidelines on community engagements under COVID-19 	IP	IP budget
			IP	IP budget
			IP	IP budget

OP 7.50 Projects on International Waterways

OP 7.50 was triggered as the Project will rely on water from the Juba and Shabelle rivers, which are considered an international waterway as defined in paragraph 1 of the Policy. The Project activities include the rehabilitation of WASH, water resources and irrigation schemes. The Bank Task Team has however determined that targeted affected areas will use local/existing water supply sources for the rehabilitation of such services and infrastructure. Consequently, the potential sources of water will be sought from water supply schemes already developed under existing water schemes. Finally, these activities will not support the construction of any water supply schemes, and there will be no direct abstraction of water from the above-named international waterways. Hence, in accordance with OP 7.50 “Projects on International Waterways”, the exception under paragraph 7(a) applies, as the Project will not adversely affect the quality or quantity of water flows to other riparians; and will not be adversely affected by other riparians’ water use. RVP clearance of the Memo seeking Exception to the Notification Requirement under OP 7.50 was granted.

6. Institutional and Implementation Arrangements

Implementation of Component activities approved by the PSC at the federal level will be led by the PIU, which is located in the MoF. The PIU, under instruction from the PSC and in consultation with state-level Ministries of Planning, and with technical support from the World Bank and UNOPS, will contract out the detailed design and implementation of Component activities.

FMS MDAs will identify sub-project interventions under the investment plans and prepare subproject designs and bidding documents in consultation with FGS MDAs, as well as support the procurement of contractors. FMS MDAs will also be responsible for contractor and site supervision, technical quality assurance, certification, and payment of works. With the addition of fishery activities, the AF will further expand the institutional arrangements to involve the Ministry of Fisheries and Marine Resources, while also building government and community capacities to support AF implementation.

It will be a priority task for the PIU to ensure timely and effective coordination between Federal and State Governments to facilitate prioritization, sequencing, investment planning and ensuring different sectoral line agencies to work together to implement the additional activities under the AF.

Implementing Partners (IPs) will be contracted by the PIU and/or MDAs to lead the detailed design of the sub-projects or activities, mainly in Component 2, including engineering design for some works. The PIU will be responsible to assist with the E&S screening process where necessary and to approve screening results and subsequent E&S plans, and to monitor and supervise the implementation of all E&S risk mitigation measures.

IPs will be contracted by the PIU to lead the detailed design of the sub-projects or activities. This includes the implementation of the E&S screening process, which is laid out in the next section, and any following planning measures that are required (implementation of an ESIA where required, design of an activity-specific ESMP, planning and budgeting for any required E&S risk mitigation measures and planning and budgeting for the organizational capacity to implement the ESMF and activity-specific E&S instruments).

The PIU will be responsible to assist with the E&S screening process where necessary and to approve screening results and subsequent E&S plans, and to monitor and supervise the implementation of all E&S risk mitigation measures.

The CSOs will thereby fulfill all requirements of this ESMF, associated E&S instruments and activity-specific E&S instruments. This will also include the implementation of the SEP, which will be done in close cooperation with FMS SPTs. These will assist in engaging targeted communities to ensure project design properly reflects local-level needs.

With design and E&S screening and mitigation measures approved by the PIU, the CSO will lead activity implementation, working closely with relevant FMS technical MDAs to ensure activity compliance with federal and state technical standards, and with this ESMF.

The overall responsibility for monitoring and supervision of this ESMF will lie with the PIU (see section on monitoring below).

The PIU will consist of one environmental specialist, one social specialist, and one GBV specialist, both with at least 8 years of experience in the implementation of safeguards in their respective fields. The PIU

will also include a GBV specialist to address GBV/SEAH risk management requirements under the project. The three will staff the Risk Management Section within the PIU, and will report directly to the Project Coordinator of the PIU. Their key tasks will be the analysis of environmental and social (including GBV/SEAH) risks related to the project; the overseeing of all partners' implementation of this ESMF and associated instruments, the monitoring of the same; the facilitation and monitoring of stakeholder engagements including GRM. They will make recommendations on how analytical and consultation outcomes should be taken up in activity-specific ESMPs and other action plans and monitor the implementation of the same; they will coordinate and monitor the implementation progress of the E&S instruments and make recommendations for changes where necessary. The overall responsibility for the implementation of all E&S instruments lies with the Project Coordinator of the PIU. The PIU will further support stand-by consultant expertise on issues such as GBV, resettlement and labor issues. It will also include a plant protection / pesticide specialist from the Ministry of Agriculture, which is the implementing agency partnering with FAO on locust response.

The PIU will be reinforced by UNOPS that will provide support to the approval of E&S screening processes and subsequent E&S planning and documentation, as well the monitoring, supervision and reporting of the implementation of specific E&S instruments and this ESMF. UNOPS will thereby act in an advisory function to the PIU, and will assist with capacity development for the PIU staff and all relevant project implementation partners (PSC, PIU, SPTs, MDAs, CSOs) in regards to the activity-specific E&S screening processes, the development of activity-specific E&S instruments, and the implementation of the ESMF with all its related E&S instruments. UNOPS will not have decision making powers over the approval of E&S screening results or any other related activities, as well as sanctions for non-compliance.

The PIU staff will work closely with the Ministry of Environment and the Ministry for Fisheries and Marine Resources for any project clearance issues. It will work closely with state and local authorities (formal and informal) in regards to project planning and implementation, especially in view of stakeholder consultations, communication and coordination. The PIU and implementing partners will draw on local NGOs and CSOs to facilitate the stakeholder engagements at the local level and facilitate IVA activities.

This will be part of UNOPS assistance in intensive project management support in the first year to build the capacity of the PIU and then gradually phase out over the lifetime of the project. UNOPS shall be expected to provide the PIU with intensive 'on the job' training during the first phase of the project.

All IPs receiving funding for project implementation must demonstrate sufficient E&S capacity among its staff in order to design and implement the necessary E&S measures. The PIU will approve demonstrated staffing capacity of the respective CSO, together with approval of general project activities.

There are some risks related to the institutional arrangements on the project and therefore for the successful implementation of this project. As the institutional arrangements for the project management will draw on government entities from different levels and sectors, there is potential lack of clarity of responsibilities. This counts especially for some level of competition over resources between the federal and state level. This can also translate into a lack of access of the government into some parts of the country, as well as a lack of information sharing between FGS and FMS.

The capacity of the government institutions involved in the project in view of the implementation of the World Bank's ESF is low, and there may be difficulties in building cooperation and coordination across different levels. Furthermore, there are limited policy and regulatory frameworks for the management of social and environmental risks.

The PIU will adopt a policy that commits to implementing the World Bank ESS. It will further ensure that all its staff work in support of this policy and have sounds understanding of it through training and capacity building measures.

A capacity assessment will be undertaken by the PIU and UNOPS, which will include task mapping; the identification of relevant institutions and actors and their assigned roles and responsibilities; an analysis of the institutional arrangements and links clarifying the respective mandates and roles; assessing the capacity of individual institutions; and recommendation of concrete action to develop capacities to be reflected in the respective ESMPs.

Matrix of Responsibilities, including safeguards

PIU	FGS and FMS MDAs	SPT
<ul style="list-style-type: none"> • Coordinating prioritizing and sequencing exercises and investment planning • Quality and process oversight • Procurement of goods and services • Seeking World Bank no-objections • Contract management oversight and controls • Financial reporting • M&E • Prepare project compliance reports • Certification of progress reports • safeguards (ESCP) compliance and monitoring including establishing and operating grievance redress mechanism • communications, awareness and outreach, and audits and reporting; 	<ul style="list-style-type: none"> • Identification of sub-Project interventions under the investment plans • Preparation of subproject designs • Preparation of sub-Project bidding documents • Supervision consultants • Site supervision and technical quality assurance • Operations and maintenance • Certification and payment of works 	<ul style="list-style-type: none"> • District-level community consultations • Review, compliance and supervision of works • Review procurement plans to assure compliance with World Bank standards • Provide coordination supports to the MDAs and Implementing Partners • Assist PIU to manage the local grievance redress mechanisms, ensure compliance with the ESCP, the ESSs and applicable safeguard documents; and carry out community outreach, awareness raising and consultations

Project Management Structure:

The Project builds on existing institutional structures to enhance coordination between Government agencies and state and federal levels and flood-affected communities, with an overarching objective to restore the legitimacy of the State and strengthen State-Citizen trust.

Project Steering Committee (PSC). The Project will be overseen by a Project Steering Committee chaired by senior staff from the Office of the Prime Minister (OPM), comprised of Director Generals of the Ministry of Finance (MoF), Ministry of Planning and Economic Development (MoPIED), and FMS MoPIED. The PSC will serve as an apex decision-making body responsible for broader strategic oversight, policy guidance, validation of broader resource allocation recommendations by the PIU, and other key decisions referred to it over time. The PSC will also approve state investment and procurement plans, conduct periodic implementation progress and compliance reviews, perform trouble shooting functions particularly in the event of disputes, liaise with high level law enforcement agencies to ensure project security, validate strategic course corrections recommended by the PIU and other project constituents, and validate PIU state performance assessments and performance-based allocations to states.

Project Implementation Unit. The Project PIU will be mapped to the MoF and co-managed and co-staffed by a combination of MoF and MoPIED personnel. It will be responsible for project management, coordination and implementation support to the FMS. These tasks will include quality and process oversight, financial management, procurement, reporting and certification, contract management, M&E, and on ensuring social and environmental safeguards compliance. MoPIED will lead the PIU functions on coordination between Federal and State Government to facilitate prioritization, sequencing, and investment planning and to ensure that different sectoral line agencies work together to implement the multi-sectoral project activities.

At the State level

FMS MDA. All implementation of medium-term recovery interventions will be delegated to the relevant FMS institutions. FMS MDAs will identify sub-project interventions under the investment plans and prepare subproject designs and bidding documents in consultation with FGS MDAs, as well as support the procurement of contractors. FMS MDAs will also be responsible for contractor and site supervision, technical quality assurance, certification, and payment of works. The Project will finance the operating costs of the respective project teams in these MDAs to ensure that existing capacity and organizational structures are used and enhanced where necessary.

State Project Teams. A State-level extension of the PIU, the SPT¹⁴⁵ is proposed as a “light” structure in each Project state, to be housed in FMS MoPIED, serving primarily as a ‘node of convergence’ at the state level. They are responsible for design review and compliance of proposed designs and supervision of works, consolidating FMS MDA procurement and work plans, and supporting the PIU to manage the FMS Grievance Redress Mechanism (GRM) and project M&E. The SPT will be led by FMS Project “focal points” that will coordinate the participation of relevant technical FMS MDAs. The SPT will review the final procurement plans to assure compliance with World Bank standards, including safeguards, GRM, building-back-better, etc., and consolidation, with onward transmission to the federal PIU for final approval by the PSC. Importantly, the SPT will be responsible for district-level community consultations and raising awareness of the project in their communities through strategic communication, and for monitoring and supervising construction works in view of their compliance with the ESF and national laws.

¹⁴⁵ May include E&S safeguards, procurement, and engineering expertise.

7. Environmental and Social Screening Process

The E&S screening process is designed to identify and appraise the type and scale of any adverse environmental and social impacts or risks that may arise from a planned sub-project, site-specific activity or even technical assistance (TA). The next step, once the relevance of such risks or impacts has been established, is to define the type and scope of additional assessments and management plans which need to be conducted or developed as part of requirements under this framework.

7.1. Identification of Sub-Project or Site-Specific Activity

The screening process commences with the identification of a respective sub-project or site-specific activity by the IP. If the sub-project is conducted in one specific location, one screening exercise should suffice. If the sub-project is conducted in a variety of locations, different screenings may have to be conducted as per site. The SPT or the PIU (depending on the level of implementation), specifically the Environmental and Social Specialists, will provide assistance in the identification of sub-projects and site-specific activities.

7.2. E&S Screening Process and Preliminary Analysis

IPs will need to conduct the E&S screening process of a planned activity prior to the commencement of the activity. The SPT or PIU will provide oversight and assistance to E&S screening processes, while IPs are responsible for the screening of all their respective activities. The screening will be based on the site- or project-specific Social and Environmental Screening Process and Report (see template in annex 1), and therefore will have to be implemented following the attached format by the environmental and the social specialists of the respective IP.

The E&S screening will help filter out activities that are not eligible under this Project, including those with too high risk and potential negative impact on the environment or society. High risk projects are included in the project exclusion list and will be avoided (see annex 1).

It will further determine and assign the activity an environmental and social risk rating based on a set of evaluation criteria (see annex1), and further identify any potential sensitive environmental and social receptors likely to be negatively impacted. The screening of sub-projects or site-specific activities will allow to estimate the risk level, based on the intrinsic environmental and social risks associated with a) the type of intervention to be carried out, and b) the type of infrastructure proposed. Where a single sub-project includes multiple types of activities or infrastructure, the risk rating will be assigned on the basis of the highest level or risk applicable for any component of the sub-project or activity, unless an exclusion risk is provided beforehand.

The E&S screening form includes a section in which alternative activities need to be discussed, where adverse risks or impacts have been identified. The potential risks and impacts identified during the screening should be considered as constraints to the activity. Project designers may find alternative options with less risks and impacts involved. Alternatively, activity design can be altered to lower the risks

and impacts. If both are not possible, appropriate risk mitigation measures have to be identified and captured in an ESMP, including monitoring mechanisms and appropriate budget for the risk mitigation measures.

Furthermore, the screening results will help advise which instruments will be relevant or required for which activity, for example, RAPs, LMPs, C-ESMPs etc... The Screening report will help to determine which ESF standards are applicable and which steps need to be taken and which provisions or procedures apply, as laid out in the ESMF.

Other critical issues identified during the screening may require closer investigation during potential ESAs. The risk level assigned to a sub-project or site-specific activity will determine if an Environmental and Social Impact Assessment (ESIA) and/or an Environmental and Social Management Plan (ESMP) are required before the activity can commence (see template for Social and Environmental Screening Process and Report, annex1).

The SPTs or PIU can assist the IPs in the process of the E&S Screening. The E&S Screening results will be submitted by the IP to the respective SPT or PIU, which will in turn provide comments on the screening results and provide approval in order for a planned activity to proceed.

For an activity that is classified as 'moderate', an activity-specific ESMP will have to be prepared by the IP. In the event that an ESMP is developed without an ESIA, the IP will be encouraged to ensure the baseline and impact sections of the ESMP are stronger than in an ESMP typically included in an ESIA(for site-specific ESMPs). This will be required to ensure as much information on the current status is collected to the extent possible and recorded as baseline data.

Given that majority of the anticipated environmental risks and impacts will occur during the construction phase, the IP/contractor will be contractually bound to prepare and implement an ESMP consistent with this ESMF and associated E&S instruments (e.g. the SEP).The IP will ensure the ESMPs summarize the context, interested parties, compliance requirements, checks for compliance, risks and opportunities, activity-specific environmental and social objectives and specific targets, training plans, inspections, peer reviews and other monitoring actions and incidents are discussed. The ESMPs will inform the actions expected from the respective IP and others and the monitoring of their performance through the PIU. IP budget will need to include sufficient funds for the preparation of ESMPs.

In the event that the IP will need to implement full or partial site- or activity-specific ESAs, the IP will – under the guidance of the PIU – develop the required assessment or plan and submit it to the PIU for approval (see TOR for ESIA in annex 10). The PIU will further approve the ESIA. IP budget will need to include sufficient funds for ESAs.

Relevant provisions of subproject-specific E&S instruments will be incorporated into procurement documents and measures implemented during implementation of the project.

A template form for the Environmental and Social Screening is presented in Annex1. The screening form may need to be reviewed and updated as needed during the process to accommodate other variables. All forms will be collated together into a screening report and shared with the PIU and the Bank for review and clearance.

7.3. World Bank Approval of ESAs and ESMPs

ESAs and their associated ESMPs will be prepared during the implementation phase as needed per screening process (Annex 1). Relevant management plans such as the Contractor's Environmental and Social Management Plan (CESMP), Resettlement Action Plan (RAP), Occupational Health and Safety Plan (OHP), Security Management Plan, GBV/SEAH Child Protection Prevention and Response Plan and Waste Management Plan (WMP) will be included in the site-specific ESMPs, reviewed and approved by the World Bank, working in collaboration with the PIU, prior to the start of any construction works and prior to the disbursement of the funding. Given that the majority of the anticipated environmental risks and impacts will occur during the implementation stage, the IP will be contractually bound to prepare and implement the CESMP, RAP, OHP, WMP, etc... consistent with (i) ESS1 on Environmental and Social Impact Assessment (ESIA), (ii) ESS2 on Labor and working conditions, (iii) ESS3 on Resource Efficiency and Pollution Prevention, and (iv) ESS4 on Community Health and Safety. Full disbursement of funding can only take place after the E&S screening has been completed and associated products and instruments have been prepared by the contractor. Sub-project budgets need to reflect sufficient funding for the implementation of all risk mitigation measures. Guidance for contractor management is available in Annex 5.

The PIU is expected to review for adequacy the management plans submitted by the IP before they can be submitted to the World Bank for approval. The PIU will exert quality control in compliance with World Bank ESSs. It will review environmental and social instruments proposed and applied by IPs to ensure that these instruments are in compliance with the applicable ESSs objectives and requirements.

Contracts will state that no sub-project works shall start until all required plans have been approved.

The TOR for the study of critical water management infrastructure for flood risk reduction for Beledweyne will be developed prior to the start of activities. It will be presented to the World Bank for review and clearance. For instances of dams, a TOR for a dam safety assessment will be included and it will be ensured that the study team will include a dam safety specialist.

7.4. ESMF/ESIA/ESMP Disclosure

The World Bank disclosure standards require that the ESMF report for the project is made available to project affected groups, local NGOs, and the public at large. A summary version will be translated into Somali. The PIU will make available copies of the ESMF and ESIA/ESMPs on strategic locations and offices of the ministries, according to the SEP. This ESMF will be disclosed on the Project website on 29 July, 2020.

7.5. Implementation of ESMP/ESIA

The Technical Specifications of the Project contract document shall include a section that will direct the respective IPs to prepare ESMPs and where applicable prepare the ESIA consistent with the provisions in the ESMF. Additional environmental, social, gender, health and safety analyses and documents can be provided as reference to help Bidders understand what will be required to implement the environmental and social measures associated with this project. The PIU, working in collaboration with the Project

Steering Committee can coordinate the procurement process, which includes the preparation of the Bidding Documents.

After the procurement of a Contractor (IP), it will be the responsibility of the PIU to orient the IP on the requirements of the project, in detail. The PIU will ensure the ESMPs are prepared by the IP and approved by the World Bank prior to commencement of the activities. This also applies to the preparation of the ESIA where this will be applicable. The site-specific ESMPs will be prepared by the IP E&S Specialists.

As regards the preparation of the ESIA, there could be a budget allocation to IPs to allow them to engage an expert firm to conduct a comprehensive assessment of the project components, consistent with the provisions of the ESMF. Given the responsibility to also design the project components, the IP will supervise the ESIA experts, in consultation with the PIU, until the ESIA is fully developed. The IP will then submit the ESIA for review to PIU which will later submit to the World Bank for approval after the PIU is satisfied with the content of the ESIA. After approval of the ESIA by the World Bank, the CSO will be required to prepare site specific ESMP based on the approved ESIA and consistent with the requirements in the ESMF. The PIU will coordinate this exercise and ensure all ESMPs and ESAs are approved by the World Bank.

During the actual implementation of the activity, the respective IPs will be expected to adhere to the approved ESMPs. The PIU will be responsible for ensuring the IP conduct the activities in compliance with the approved ESMPs.

The respective state-PIUs will work closely with the State-level Ministries responsible for environmental matters as key focal points for the administration of this ESMF, despite a lack of legislation regulating the necessity and procedure of ESAs.

8. Monitoring Plan

8.1. Regular Monitoring and Inspection for Compliance

The goals of monitoring are to measure the success rate of the activities, determine whether interventions have handled negative impacts, and whether further interventions are required or monitoring is to be extended in some areas. The goal of inspection activities is to ensure that sub-component activities comply with the plans and procedures laid out in the ESMF and in activity-specific instruments.

The main monitoring responsibilities and inspection activities will be with the PIU, which will administer the overall project-related environmental and social monitoring and implementation as laid out in this ESMF, as well as the SEP. The Project Coordinator of the PIU will be overall responsible for the implementation of the environmental and social mitigation measures, as well as for monitoring and inspections for compliance. The Environmental and the Social Specialist in the PIU will be handling the day-to-day tasks in regards to the implementation of the ESMF and associated instruments. In addition, Contractors are expected to monitor their own implementation of E&S risk mitigation measures as per this ESMF; and Independent Verification Agents (IVA) will also include E&S risk mitigations in their project monitoring activities.

The ESMF is the overall document that guides the development of site specific ESMPs. While the ESMF, laying out expectation from CSO and all implementers – all implementers will be responsible for their own site/activity specific screening, impact assessments, development of site/activity-specific ESMPs, monitoring of impacts, and administration of mitigation measures in regards to their respective sub-component activities. They further commit to integrate stakeholder inputs into their regular monitoring and reporting activities. All implementers are committed to report all screening result (see reporting format in ANNEX1), results of ESIA, site/activity-specific ESMPs, to the PIU.

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 (see Annex 7).

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.¹⁴⁶

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

Furthermore, IVAs will be deployed to monitor overall project implementation, including the implementation of E&S Risk Mitigation Measures. The IVAs will report non-compliance to the PIU and directly to the World Bank.

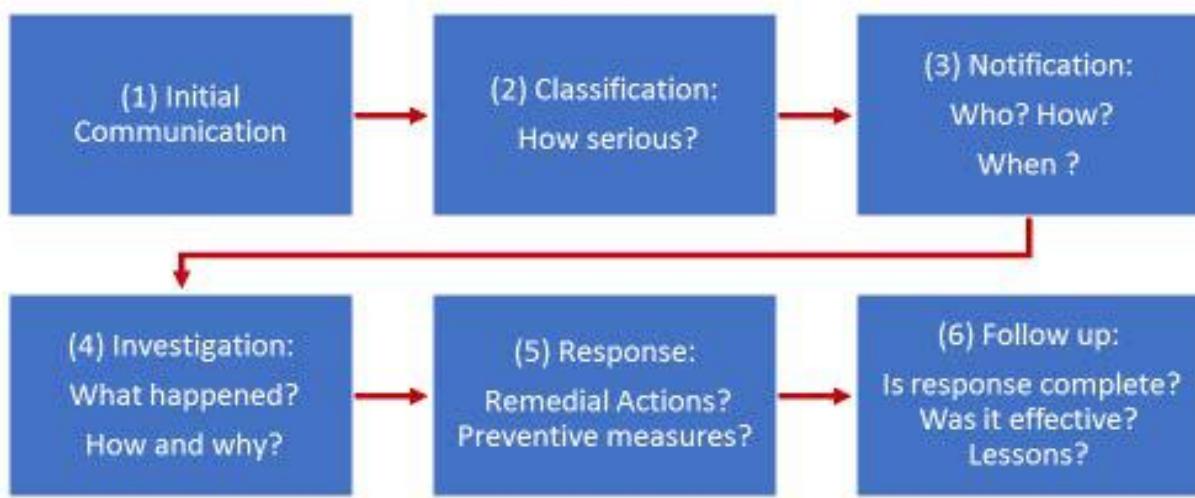
Upon completion of the Project, the PIU shall undertake an assessment of the success of the ESMF and include relevant information in the Implementation Completion Report (ICR). This ICR will be followed by the Bank's own ICR. If either of these assessments reveals that any key objectives of the ESMF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

Implementation (work plan) progress shall be reported by the IPs to the PIU (or SPT), and verified by the PIU through periodic project site visits. The PIU in turn will keep the PSC and the WB properly updated on implementation progress. It is also expected that the IP maintains a supervision consultant to supervise activities in the implementation of E&S instruments.

8.2. Incident and Accident Reporting

Incident reporting will follow the below management and reporting process:

¹⁴⁶ Frequency will be determined by the need but expected to be more frequent at early stages of project implementation



Incidents should 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 (see annex 8 for World Bank incident classification guide). A ‘severe’ incident causes great harm to individuals, or the environment, or presents significant reputational risks to the World Bank.

Severe incidents (an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, e.g. fatality, GBV, forced or child labor) will be reported within 24 to the PIU and the World Bank (see Annex 9 for key information on incident reporting). Further guidance on reporting of serious and indicative incidents is provided in Annex 19.

Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the implementer has to handle the case appropriately, and refer the case to the GBV referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan.

8.3. ESMP/Monitoring Table

The below ESMP monitoring table will be adapted for each sub-project or site-specific activity, as not all risks, mitigation measures and indicators are relevant for each sub-project.

P	E&S Risks and Impacts	Mitigation Measures	Monitoring Indicator	Frequency of Monitoring	Responsibility for Monitoring	Budget in USD
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts						
Targeting and diversion						
ESS1	Project benefits being diverted to ineligible and less-deserving locations and individuals	<ul style="list-style-type: none"> Use of Floods Impact Needs Assessment (FINA) to guide the selection of project sites for priority investments to address site selection and elite capture concerns Continuous monitoring of the project to take account of changing dynamics that have implications for risks for manipulation of project 	Project sites selected using FINA Changing dynamics, if any, recorded	Weekly before actual implementation of the project activities. Weekly	IP/PIU	Included in staff costs
	Diversion of sub projects. Sub project can be diverted at point of delivery. Given that monitoring in conflict situations can be difficult, there is a likelihood that project resources and sub projects get diverted at different stages of project implementation.	<ul style="list-style-type: none"> Engagement of high capacity implementation support agencies to support project monitoring Ensure that selection of beneficiary locations, modes of selection and decision making are widely disseminated among the public (SEP) 	Records of minutes for meetings held to support project monitoring Available records on SEP	As and when meetings are held Weekly	IP/PIU	Included in staff costs and IVA costs

		<ul style="list-style-type: none"> • Closely monitor the use of project resources through IVA or other monitors • Where physical monitoring is not possible, deploy technological means to monitor the implementation of physical sub projects 	<p>Report on the use of project resources based on available monitors</p> <p>Report on change of means to monitor implementation of physical sub-projects</p>	<p>Monthly</p> <p>As and when the need arises.</p>		
	<p>Project investments may not reach the truly vulnerable, marginalized and minority members of the community. This is further exacerbated by the nature of some interventions being rolled out such as cash transfers, weaker formal redress systems and limitations in effective community engagements and participation</p>	<ul style="list-style-type: none"> • Conduct FINA with support from development partners to estimate the extent of damages caused by floods as well as guide priorities for recovery, including selection of locations for investments • Conduct Fisheries Needs Assessment to identify gaps needing attention and the subsequent assessment of equipment/materials required to promote fisheries sector. • Implement robust stakeholder engagements (see SEP) – especially at the 	<p>FINA conducted and available for application.</p> <p>Gaps identified and prioritized.</p> <p>Dates stakeholder engagement held and minutes/report of the engagement process.</p>	<p>As and when there is need.</p> <p>Monthly</p>	<p>IP / PIU</p>	<p>PIU E&S Specialists' travel budget: 200,000</p>

		<ul style="list-style-type: none"> community level - to explain the rationale for selection of sites for investments Sensitize communities on the availability of a project grievance redress mechanism (GRM) to support the systematic uptake, processing and resolution of project related complaints and grievances (see SEP) 	Record of sensitization programs held, location, date and time.	At least a week before contractor moves to site for project implementation		
Fish Project Activities						
Anticipated E&S risks and impacts to emanate from proposed construction of small-scale fish landing, processing and handling sites and rehabilitation and reconstruction of water infrastructure for food insecure communities. Impacts may include; o) challenges with the disposal of the construction wastes and materials, p) Impacts on marine and benthic animals and plants	<ul style="list-style-type: none"> Appropriate mitigation measures for the respective risks and impacts identified for the proposed construction of small scale fish infrastructure are provided under the respective environmental and social safeguards discussed below. The updated frameworks shall be guiding tool to further develop a Site Specific Environmental and Social Management Plan when the project site is known. 	Updated GBV Action Plan, LMP, and SMP. Stakeholder engagement with fishing communities conducted	Prior to commencement of activities	PIU		Included in staff costs

	<p>q) disposal and management of large amounts of excavated material generated from construction activities during the construction phase</p> <p>r) Erosion and sedimentation of rivers from earth works and run-off during the construction phase</p> <p>s) Occupational health and safety of workers both during the construction and operational phases</p> <p>t) increased level of dust, noise and vibration from moving of construction vehicles and machinery, and community health and safety risk and pollution of surface and groundwater sources</p> <p>u) Insecurity associated with working in rural Somalia which may jeopardise the implementation</p>	<ul style="list-style-type: none"> • Additionally, any new risks and impacts under AF associated with labor, security and Gender Based Violence (GBV) should be reflected in updated LMP, Security Management Plan and GBV Response Plan as required • To address insecurity associated with working in rural Somalia, additional stakeholder engagement and community participation should be conducted. 			
--	---	---	--	--	--

	process of the project.					
	•					
Access						
Access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring will be a challenge, as Project locations are likely to be remote underserved areas with basic physical and community infrastructure devastated by drought and floods.	<ul style="list-style-type: none"> • Involve humanitarian and development organizations with valuable knowledge and experience in delivering specialized operations in the target locations to provide relative advantage to challenges of access to site • Monitoring will also be provided by the same high capacity institutions 	Humanitarian development organizations involved in delivering specialized operations in target location	Before project implementation	IP/PIU	Included in staff costs	
Inward Migration						
Risk of population influx from neighboring district and locations, which may upset community dynamics and perpetuate clashes and animosity exacerbating social and environmental fragility	<ul style="list-style-type: none"> • Select priority areas guided by findings and recommendations from FINA for flood aspects • Proper and transparent targeting of vulnerable populations, ensuring inclusion in particular 	Priority areas selected using FINA Report on selected vulnerable populations and rationale used.	Monthly At least a month prior to implementation of project interventions.	IP/PIU	Included in staff costs	

		for displaced populations, for cash-based interventions and the small amounts of transfers is seen as a mitigating measure against harmful inward migration				
Systemic Weaknesses						
	Capacity of the borrower to identify, understand and preventing adverse social impacts on the project is limited. This includes capacity for monitoring of impact and redressing the impacts of social harm where it has occurred.	<ul style="list-style-type: none"> Engage humanitarian and development organizations to fill capacity gaps for the application of risk mitigation protocols and monitoring of impacts for social harm. Build the capacity of the borrower in the implementation of risk mitigation measures and the monitoring thereof throughout project implementation 	<p>Evidence to show humanitarian and development organizations engaged for this purpose</p> <p>Report on capacity building of borrower</p>	<p>Whenever this is needed</p> <p>Whenever this is determined (Prior to commencement of project implementation and whenever there're new staff recruitments)</p>	PIU/World Bank	Included in costs of UNOPS
Conflict						
	Conflict and tensions can rise over the selection of locations of new infrastructure	<ul style="list-style-type: none"> Conduct contextual analysis and conflict mapping prior to engagement 	Conflict mapping conducted	Prior to implementation of project interventions.	IP/PIU	Included in staff costs

	Lack of inclusion can lead to grievances over sub project selection and benefits. There is a risk that some groups are not included in decision making fora and that they do not end up benefitting from the sub projects. This can lead to grievances over the decision-making fora, those in decision-making powers and the sub projects.	<ul style="list-style-type: none"> Implement and monitor GRM 	GRM developed & register in place to show grievance status	Weekly	IP/PIU Included in staff costs
	Conflict risks due to deployment of contractors	<ul style="list-style-type: none"> Implementation of contractor management procedures (see Annex 5) 			IP / PIU budget
ES Assessments, ESMPs, C-ESMPs					
	Lack of quality of ES Assessments	<ul style="list-style-type: none"> Monitoring of field research for ES Assessments 	Field Assessments have taken place	During field assessments	PIU PIU staff and travel budget
	Lack of quality of ESMPs	<ul style="list-style-type: none"> Review of ESMPs 			PIU PIU staff costs
	Lack of quality of C-ESMPs	<ul style="list-style-type: none"> Review of C_ESMPs 			PIU PIU staff costs
	Feasibility studies, technical design, policies, plans and strategies developed or conducted may have significant E&S impacts	<ul style="list-style-type: none"> Integrate E&S objectives into TA process Promote transparency through stakeholder participation and publich information disclosure 	TOR for TA include E&S objectives Stakeholder engagement conducted	Prior to study	PIU, IP PIU staff costs
<ul style="list-style-type: none"> ESS 2: Labor and Working Conditions 					

ESS 2	Security of all Project workers,	<ul style="list-style-type: none"> Implement and monitor Security Management Plan (SMP) 	Record to indicate monitoring of SMP	Weekly	IP/PIU	Included in staff costs and travel budget
	Risks of child and forced labor	<ul style="list-style-type: none"> Ensure that labor for the project will be sourced and managed responsibly including the set-up of a workers' GRM. 	Labor register showing age and sex of persons engaged. Worker's GRM in place	Weekly	IP/PIU	Included in staff costs
	Lack of occupational health and safety (OHS) for workers deployed at construction sites.	<ul style="list-style-type: none"> Provide necessary personal protective equipment (PPE) to all field officers directly involved in spraying. Training on use of PPE Implement procedure of dealing with accidents and exposures hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth) 	PPE provided Training held Incidents recorded, RCAs conducted Lists of dates, number of trainees, and topics available	Daily / periodic visits from PIU Monthly	Contractors/Supervision consultant PIU PIU	Included in staff costs
	Field officers directly involved in spraying operations may be exposed to insecticides and run the risk of being poisoned. Other field staff can also be exposed, either accidentally or during the normal course of their work based on task assigned or a number of tasks					

Delayed payment of workers or community workers leading to complaints and conflict	<ul style="list-style-type: none"> Implement and monitor PMC 	Record of appropriate measures taken	As and when this occurs	IP/PIU	Included in staff costs
Underpayment of contracted workers or supply workers					
Labor and working conditions of community workers don't comply with WB and Somali legislation – including occupational health and safety risks.	<ul style="list-style-type: none"> Implement and monitor the LMP (see annex 6) Develop and implement OHS Plan for workers Listing of all staff and titles, new hires and departure sites visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector or auditor name 	Audit records in place OHS Plan in place and compliance status available Staff lists available Site visits conducted	Monthly	IP/PIU	Included in staff costs
Poor working conditions: unsafe work environment	<ul style="list-style-type: none"> Conduct safety risk assessment of work site/sub-project and provide safety talks 	A record of Safety Risk Assessment Reports & A record of safety talks conducted – as part of the OHS Plan PPE provided	Weekly	IP/PIU	Included in staff costs and travel budget

			Lost time incidents or near miss incidents recorded Training provided on OHS			
	Labor standards are not in accordance to national laws and international standards	• Implement and monitor the LMP (see annex 6)	Audit report available	Monthly	IP/PIU	Included in staff costs
	Poor working conditions: lack of workers' rights					
	Discrimination against women in employment	• Contractor to develop recruitment and retention policies that enable fair working conditions and women's safe and equitable participation. • List number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, and skill level (unskilled, skilled, supervisory, professional, management).	Training of workers on GBV undertaken Training of communities on GBV undertaken CoCs with provisions on GBV/SEAH signed by all workers and understood Workers' GRM includes reporting channels and procedures for reporting cases of SH List of workers available	Monthly	IP/PIU	Included in staff costs
	Labor influx leads to increase of GBV cases			Monthly	IP/PIU	Included in staff costs
	Delayed payments / cash transfers may lead	• Timely payment	Awareness campaign conducted	Prior to activities	IP/PIU	PIU staff budget

	to complaints and conflicts	<ul style="list-style-type: none"> Communication / awareness campaign of payment mechanisms 				
	Covid-19 infection risks for workers at site	<ul style="list-style-type: none"> Follow specific Covid-19 guidelines for workers at construction site (see Annex 15) 	Covid guidelines are followed	Throughout activities	IP/PIU	PIU staff budget
	Workers coming from infected areas Co-workers becoming infected Workers introducing infection into community/general public Risk of spreading the infection among the workforce and the medical personnel.	<ul style="list-style-type: none"> Assuring proper and quick access to appropriate and timely medical services, Educate hand hygiene and PPEs, that is not based on ability to pay or other factors; and Anticipate and address issues resulting from people being kept in quarantine. 	<p>Evidence for nearby medical access</p> <p>Education on hand hygiene has been conducted</p>	Prior to activity commencement	IP/PIU	PIU staff budget
	Workers denied the opportunity to complain they do not have adequate PPE to protect themselves against COVID 19	<ul style="list-style-type: none"> Grievance Mechanism in place 	GRM records from activity area	monthly	PIU	Included in PIU staff costs
	Risk of the spread of the pandemic among health professionals	<ul style="list-style-type: none"> Ensure appropriate training on Infectious Prevention and Control for healthcare workers and other staff. Plan for surge capacity, estimate the needs in terms of patient beds, respiratory support, PPE, staff and 	<p>Training has been conducted, participants list provided</p> <p>Provide estimates</p> <p>Training in health care waste management has been conducted /</p>	Prior to activity	PIU	Included in PIU staff costs

		<p>diagnostics. Laboratory capacity and therapeutics should also be included in these estimates</p> <ul style="list-style-type: none"> • Consider restricting non-essential visits and ensure that everyone, including patients and visitors, at the healthcare facility are aware of the need for hand and respiratory hygiene, including suitable cough etiquette • Ensure training in Health care waste management systems, which enable health care waste to be managed responsibly, without harming the community or the environment. • Staff engaged in waste management should wear PPE. • Waste should be treated as infectious clinical waste Category B (UN3291) [30] and handled in accordance with healthcare facility policies and local regulations 	provide participants list		
--	--	---	---------------------------	--	--

	Occupational health and safety risks and hazards associated with fish processing and storage facilities	<ul style="list-style-type: none"> Follow OHS guidelines set out in General EHSGs and EHSGs for Fish Processing. LMP and OHS Plan to reflect the necessary policies and procedures for risk assessment and management. 	Provision of LMP and OHS Plans	Prior activities to	PIU	PIU staff costs
--	---	--	--------------------------------	---------------------	-----	-----------------

ESS 3: Resource Efficiency and Pollution Prevention and Management

Locust control						
	Pesticides used may cause surface and ground water pollution, leading to potential (temporary) reduced availability of drinking-water. Pesticides can get into water through accidental spillage during use or transport, washing of spray equipments after spray operation and aerial spray.	<ul style="list-style-type: none"> Implement and monitor PMP Apply pesticides only in areas where this is needed and with the recommended dosage. During application of this pesticide, ensure precautionary measures are adhered to as guided by the Material Safety Data Sheet of the pesticide in use, 	Report on pesticide application and areas covered	Monthly	IP/PIU	Included in PMP budget section
General Civil Works						
ESS 3	Generation of solid waste,	<ul style="list-style-type: none"> Appropriate designated areas for disposal of solid waste shall be identified in consistent with the local and international requirements. 	Record of actual sites	Monthly	IP/PIU	Included in staff costs
	Generation of dust and noise,				IP/PIU	

	<ul style="list-style-type: none"> Resource efficiency measures will be analyzed and incorporated as part of CESMPs 	Measures implemented	Weekly		Included in staff costs and travel budget
	<ul style="list-style-type: none"> Where feasible, practice minimal or none vegetation disturbance during the implementation of the project, avoid exposing the soils to external weather conditions. 	<p>TSS levels in potentially affected rivers close to baseline status</p> <p>Implementation of soil erosion control measures as applicable to the sub-project</p>	after storm events	IP/PIU	Included in staff costs, , costs for monitoring equipment(e.g. to measure TSS): 5,000 USD
	<ul style="list-style-type: none"> Should the project utilize raw materials for construction activities, the material will be sourced through measures specified in Good International Industry Practices (GIIPs). 	<p>Excavated material disposed at designated sites</p> <p>Where this is reused, measures applied as stated in GIIPs</p>		IP/PIU	Included in staff costs and travel budget
	<ul style="list-style-type: none"> High level maintenance of the vehicles to reduce the vibrations Selecting equipment with lower sound power levels Installing suitable mufflers on engine exhausts 	<p>Record maintenance of vehicles</p> <p>Noise level against baseline status</p> <p>Mufflers installed</p>		IP/PIU	Included in staff costs and travel budget

		<ul style="list-style-type: none"> compressor components • Installing acoustic enclosures for equipment casing • Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance. 	<p>Acoustic enclosures installed</p> <p>Record of meeting/sensitization program to inform the community</p>	Monthly		
Desilting of weirs / boreholes / springs / sanitation systems / irrigation schemes / rehabilitation of facilities						
Soil Erosion during desilting of weirs/dams and reinforcement of river banks		<ul style="list-style-type: none"> • Implement soil control measures 	Record of soil erosion control measures in place	Monthly	IP/PIU	Included in staff costs and travel budget
Water contamination from oil spills during works.		<ul style="list-style-type: none"> • Implement water pollution control measures 	Oil/water separators installed and operational	Monthly	IP/PIU	Included in staff costs and travel budget
Sil contamination from oil spills		<ul style="list-style-type: none"> • Implement measures to protect the soil from oil contamination 	Storage of petroleum products such as fuel, oil, etc... shall be done on sealed surface to prevent soil contamination	Monthly		
Disturbance of flora and fauna (terrestrial and aquatic) during construction of piped water schemes		<ul style="list-style-type: none"> • Implement measures to protect against disturbance of flora and fauna 	Protection measures of Flora and fauna in place	Monthly	IP/PIU	Included in staff costs and travel budget

	<p>Irrigation water with high Total Dissolved Solids (TDS) may lead to salinization of the soils. Acceptable limit is less than 500ppm¹⁴⁷ pp</p>	<ul style="list-style-type: none"> Conduct analysis of irrigation water to ensure water with TDS above 1,500ppm is not used for irrigation. 	<p>Analysis of irrigation water in place</p>	<p>Before the water is utilized for irrigation</p>	<p>IP/PIU</p>	<p>Included in staff costs and travel budget</p>
	<p>Shallow water table is commonly contaminated with coliforms, fecal coliforms, fluorides, and nitrate. These contaminants can cause moderate to high significance health impacts on the communities</p>	<ul style="list-style-type: none"> All open wells must have a parapet wall. Preferably cover the well with an appropriate roofing structure to avoid contaminants in the well for this reason, and to minimize instances of people/animals falling into the well Method of drawing water from open wells should not be labor intensive. Community groups to receive guidance on hygiene practices in and around the water point to avoid potential contamination of the water sources. Water quality test to confirm water is potable 	<p>Parapet wall in place Appropriate roofing structure on open wells</p> <p>Acceptable method in place</p> <p>Record in place to show delivery of guidance on hygiene practices to community groups</p> <p>Water quality test performed</p>	<p>Monthly</p>	<p>IP/PIU</p>	<p>Included in staff costs and travel budget</p>

Health Care provision

	<p>Health care waste risks leading to contamination through medical waste that is not properly disposed (infections, pollution/contamination of the environment – air, land, water physical injuries, effect on domestic animals)</p>	<ul style="list-style-type: none"> • Implement and monitor health care waste management procedures based on <i>WBG Environmental, Health, and Safety General Guidelines</i>, including training of health care workers and auxiliary staff on how to safely handle health care waste • Provide adequate and appropriate protective clothing; use appropriate types of polythene bags and containers for waste; appropriate storage of health care waste until end of day; treat health care waste appropriately at hospitals, etc....). 	<p>Health care waste managed based on WBG EHS General Guidelines</p> <p>Records of health care waste disposal</p> <p>Records indicating use and type of PPE in place.</p> <p>Records indicating type of container used to contain health care waste, in place</p>	<p>Monthly</p>	<p>IP/PIU</p>	<p>Included in staff costs and travel budget</p>
Sanitation						
	<p>The pit latrines and septic tanks if not well sited and maintained will be a source of foul smell that will affect those within the area</p>	<ul style="list-style-type: none"> • Ensure proper siting of septic tanks and pit latrines in accordance with the MOH guidelines for siting and construction of pit latrines 	<p>Report showing siting and construction of septic tanks consistent with MOH guidelines</p>	<p>Monthly</p>	<p>IP/PIU</p>	<p>Included in staff costs and travel budget</p>
	<p>Fecal matter may lead to underground water contamination if the water table is high or in the case of pit latrines,</p>					

	when there is an overflow due to heavy rains. Contamination of water may lead to outbreak of diseases e.g. cholera, dysentery, typhoid, diarrhoea etc.				
	Pit latrines can also be breeding grounds for flies and mosquitoes which are disease vectors	<ul style="list-style-type: none"> Ensure proper maintenance of sanitation facilities including cleaning and hygiene training 	Checklist developed and used to indicate status of sanitation facilities	Monthly	IP/PIU Included in staff costs
	Super structures if poorly constructed and designed could lead to hazards including falling into the pit if the super structure floor/slab gives ways. This can lead to injury or loss of life.	<ul style="list-style-type: none"> Ensure super structures are well constructed including the slab with the required strength 	Checklist developed and used to indicate superstructures are well constructed	Monthly	IP/PIU Included in staff costs
	Common pests attracted to dirty environment are rats, cockroaches, flies. These animals are also disease vectors. They transport germs from the toilet to nearby human settlement.	<ul style="list-style-type: none"> Provide hand washing facilities and water in all the sanitation infrastructures Ensure proper cleaning of toilets Ensure and provide training on cleaning of toilet Use biopesticides to manage pests 	Hand washing facilities provided Checklist developed and utilized to record hygiene status of toilets Records available Records available	Monthly	IP/PIU Included in staff costs and travel budget

Discharge of Waste

	Generation of a wide range of waste effluents (waste water from washing and cleaning operations, oils and oily water generated by machinery maintenance, leaked/spilled fuels and oils, waste effluent discharges from the processing operation, animal wastes, and others)	<ul style="list-style-type: none"> Design activities employing technologies that are least polluting; Carry out treating and recycling of waste effluents as far as possible and practical before safely being discharged in designated areas or reused 	Appropriate technologies in place Analytical results to show compliance (following WB EHS Guidelines)	Monthly	IP/PIU	Included in staff costs
	Uncontrolled discharges of these wastes and other effluents can potentially contaminate the soil, pollute the nearby water bodies and degrade their value for communities and ecology	<ul style="list-style-type: none"> Ensure that waste is not released into any drinking water source, cultivation fields, or critical habitat 	Record on status and management of waste	Monthly	IP/PIU	Included in staff costs
	These discharges can potentially affect the soil fertility, pollute the drinking water sources, contaminate irrigation water thus affecting the crops, and thus negatively affecting the ecology of the area including natural flora and fauna.	<ul style="list-style-type: none"> Waste effluents will be not be released in irrigation channels 	Record on status and management of waste	Monthly	IP/PIU	Included in staff costs
	Wastewater/runoff from cultivation activities may	<ul style="list-style-type: none"> Execution of the following will be critical; 	Progress Reports	At start of the project	PI/PIU/Ministry of Marine and Fisheries	

	contaminate water for fisheries	<ul style="list-style-type: none"> (i) protection and conservation of vulnerable habitats; (ii) soil and water conservation practices such as afforestation, agro-forestry programmes, terracing, grass planting etc. to minimise run-offs; (iii) formulation of by-laws by the water users associations of each of the sites; (iv) public education and sensitization to create awareness and sensitivity towards environmental management; 				
Solid Waste						
	Generation of solid wastes (including human and animal secreta, wastage from packing operations and others)	<ul style="list-style-type: none"> • Minimize use of non-biodegradable substances (e.g. for packaging) • Minimize generation and Recycle solid waste as far as possible and practical • Adopt composting of biodegradable waste if practicable • Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, 	<p>Checklist in place to show adherence to the following;</p> <p>Use of biodegradable materials</p> <p>Recycling solid waste</p> <p>Composting</p> <p>Record of waste disposed in designated sites</p> <p>Status of disposal site</p>	Weekly	IP/PIU	Included in staff costs and travel budget

		<p>cultivation fields, irrigation channels, natural drainage paths, wetlands and critical habitat, the existing waste management system in the area, local routes, and general aesthetic value of the area</p> <ul style="list-style-type: none"> • Ensure the protection of disposal areas 			
	Inappropriate disposal of these wastes can potentially have negative environment and ecosystem impacts in the area, while also contaminating soil and water	<ul style="list-style-type: none"> • Ensure that disposal of waste will not be a danger to children • Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal 	Record of sensitization program GRM in place	Monthly	IP/PIU Included in staff costs and travel budget
Construction of roads					
	Construction of roads can lead to serious land erosion and landslides	<ul style="list-style-type: none"> • Up and down stream slope stabilization, planting of thick vegetation, use of lightweight rollers or other manual means of compaction 	Record to show execution of slope stabilization done to curtail land erosion and landslide	Monthly	IP/PIU Included in staff costs and travel budget
ESS 4: Community Health and Safety					
ESS 4		Locust Control			
ESS 4	Settlements nearby spray area may be affected by activities around pesticide storage, accidental	<ul style="list-style-type: none"> • Implementation and monitoring of PMP • Informaing of inhabitants of the zone in which the 	Audit report Record of meetings/sensitization program	Before commencement of program of spraying.	IP/PIU Included in staff costs and travel budget

	spillage, contaminated equipment, overspraying, entry into sprayed area and exposure to empty pesticide containers	treatments take place of the operation beforehand, warnings not to come close				
	Pollution of communal drinking water due to insecticides	<ul style="list-style-type: none"> Selection of the right insecticide for a given situation or environment, using the appropriate control strategy and method, and strictly applying environmental protection measures where possible 	Control strategy in place and implemented	Daily	IP/PIU	Included in staff costs and travel budget
	Community health and safety risks through exposure to pesticide through potential involvement in Desert Locust control (help localize spray targets) or through consumption of contaminated food grown in sprayed areas	<ul style="list-style-type: none"> Control teams ensure that nobody is present in the area to be sprayed 	Records of roll call conducted	Before application of pesticide	IP/PIU	Included in staff costs
	Livestock will graze on green pastures just like locusts and insecticide residues can end up in meat and milk after locust control operations.	<ul style="list-style-type: none"> Villages or habitations, open water and nature reserves will be off limits for all insecticide treatments against locusts. Wells or waterholes that lie in the area in which treatments take place will be covered up. Beehives will also be covered up temporarily 	Report on measures taken signed off by Project Manager	Before application of pesticide	IP/PIU	Included in staff costs

		to protect them further from any unexpected spray drift.				
Labour influx						
Increased GBV/SEAH cases	<ul style="list-style-type: none"> Implementation and monitoring of GBV / SEA Action Plan 	Audit report in place	Monthly	IP/PIU	Included in staff costs	
Spread of communicable diseases (SII's , HIV/AIDS etc..)	<ul style="list-style-type: none"> Community awareness sessions on communicable diseases 	Records showing number of community awareness sessions	Monthly	IP/PIU	Included in staff costs	
Security						
Security risks for all project workers, communities, beneficiaries and other project-affected parties largely characterized by a dire humanitarian situation due to multiple and simultaneous crises afflicting the country compounded by weak and developing government systems	<ul style="list-style-type: none"> Partner these organizations with local NGOs that have a good understanding of local dynamics an important factor in managing exposure to security threats 	Record of partnership in place	Prior to effecting project interventions	IP/PIU	Included in staff costs	
Provision of cash support for affected households, cash for work and unconditional cash transfers raise the	<ul style="list-style-type: none"> Involve UNOPS and other humanitarian and development organizations with valuable knowledge 	Records to show involvement of UNOPS and other organizations	Prior to effecting project interventions	IP/PIU	Included in staff costs	

	profile for targets by opportunistic armed actors in a context of recent history of relative lawlessness and the potential for increased conflict.	and experience in delivering specialized operations in the target locations and provide relative advantage to challenges of access to site and the identification and mitigation of security threats to project operations				
Inward migration						
Harmful inward migration as the project will mainly operate in a small number of sites relative to immense and widespread need, possibility of population influx from neighboring district and locations	<ul style="list-style-type: none"> Proper and transparent targeting of vulnerable populations, ensuring inclusion in particular for displaced populations, for cash-based interventions and the small amounts of transfers is seen as a mitigating measure against harmful inward migration 	Checklist developed to show selection of vulnerable populations	Prior to effecting project interventions	IP/PIU		Included in staff costs
Upsetting of community dynamics and perpetuated clashes and animosity exacerbating social and environmental fragility	<ul style="list-style-type: none"> Selection of priority areas guided by findings and recommendations from FINA 	Report indicating selected areas based on FINA findings	Prior to effecting project interventions	IP/PIU		Included in staff costs
Delayed payments / cash transfers may lead to complaints and conflicts	<ul style="list-style-type: none"> Timely payment Communication / awareness campaign of payment mechanisms 	Number of sessions held on communication awareness	As and when needed			
GBV Risks						

	Potential risks of gender-based violence increase with the receipt of cash transfers by women and children (within households or at payment points)	<ul style="list-style-type: none"> Implement and monitor GBV/SEAH Child Protection Prevention and Response Plan 	tbd			
	Risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors	<ul style="list-style-type: none"> Engage a dedicated specialist to support oversight and management of these risks 	Specialist engaged	Prior to activity	IP/PIU	Included in staff costs
	Increased GBV risks based on the design and location of infrastructure: infrastructure maybe designed without taking into account women and girls safety considerations (privacy, location), dignity (privacy and women's requirements for use) and accessibility (no ramps etc) to facilitate access for persons with disabilities.	<ul style="list-style-type: none"> Ensure design of infrastructure meets the needs of all women and girls, including safety, accessibility (based on universal design) and dignity Safety audits will be developed for all relevant activities to ensure protection and security of affected communities and alignment with global protection standards 	Design documents Safety audits conducted	Prior to construction	IP/PIU	Included in staff costs Included in costs of Security Management Company
Community Infrastructure						
	Exposure of community members to physical hazards on project sites	<ul style="list-style-type: none"> Undertake safety precautions to address safety hazards for the nearby community, including, safety/warning 	Records to show community sensitization on safety, in place Safety warning signs in place	Prior to project commencement & subsequent monthly sensitizations Every time there is works on site	IP/PIU	Included in staff costs and travel budget

	Traffic and road safety hazards	<ul style="list-style-type: none"> • signage, safety barrier around the construction site, and safe driving practices • Informaing public about construction risks 	<p>Traffic management plan in place</p> <p>Training for road workers on risks conducted</p>			
	Health issues including water-borne and vector borne diseases resulting from poor site management such as stagnant water	<ul style="list-style-type: none"> • Simplified E&S construction checklists to be included in the civil works contracts, as part of C-ESMP • Ensure good house keeping at every work sites 	<p>Simplified E&S construction checklist in place</p> <p>Checklist showing good housekeeping status</p>	Weekly	IP/PIU	Included in staff costs
Debris Removal						
Removal of debris affects new location aesthetically		<ul style="list-style-type: none"> • Implement and monitor waste management procedures based on <i>World Bank Group Environmental, Health, and Safety General Guidelines</i> 	<ul style="list-style-type: none"> • Waste management procedure in place • Records of amount of waste disposed available 	Weekly	IP/PIU	Included in staff costs and travel budget
Debris removal poses a safety risk for the community at the new location						
Water and irrigation schemes						
Health impacts on communities through contamination of open wells (with coliforms, fecal coliforms, fluorides, and nitrate)		<ul style="list-style-type: none"> • Community groups to receive guidance on hygiene practices in and around the water point to avoid potential contamination of the water sources 	Record of guidance provided to community	Monthly	IP/PIU	Included in staff costs
Lack of community ownership hampers operation and		<ul style="list-style-type: none"> • Site selection to be based on community engagement for the 	Records showing number and place of	Monthly		

	<p>maintenance of water infrastructure and its long-term</p>	<p>protection of these sites, in order to ensure community ownership from the onset</p> <ul style="list-style-type: none"> • Ensure that the sites of these projects will not pose a danger to children and will be properly fenced with messages shared to the community on maintaining the safety • Ensure that there will be no risks to women and girls from accessing these facilities • Ensure that these points are designed in such a way that promotes accessibility to people with disabilities 	<p>community engagements</p> <p>Record of community engagement on safety, and installation of signage</p> <p>Record of appropriate training to women and girls, available</p> <p>Designs available to allow easy access by disabled.</p>	<p>Before commencement of project interventions and subsequent weekly sensitization</p> <p>Whenever this is needed</p> <p>At design stage</p>		
	<p>Sustainability of water infrastructure will be hampered should systems be built without considerations for how systems are managed, ran and financed in the future</p>	<ul style="list-style-type: none"> • Ensure that for each water point constructed, a community group is set up, with the sole purpose of operating, maintaining and managing the overall system 	<p>Records to show community group set up for each water point</p>	<p>Whenever this is needed</p>	<p>IP/PIU</p>	<p>Included in staff costs and travel budget</p>

Sanitation schemes					
Latrines have the possibilities of spread and contact of pathogens and other pollutants with the humans at the household level	<ul style="list-style-type: none"> Train communities on better hygienic and sanitation practices (e.g. washing hands with soap after defecation, no open defecation in and outside house) as well as on maintenance and cleanliness practices (e.g. daily or twice a day cleaning of latrine). Make gender marking for men/women clearly visible 	<p>Number of training sessions conducted and locations</p> <p>Gender marking done, clearly visible</p>	<p>Monthly</p> <p>As soon as latrines are identified</p>	<p>IP/PIU</p>	Included in staff costs and travel budget
In open drains the possibility of human-pollution contact remain high, these drains only serve the purpose of conveyance, and throughout conveyance human-pollution interaction remain active. This interaction causes serious negative impacts on the community health	<ul style="list-style-type: none"> Whenever drains will be improved or lined then these must be converted into covered drains Provide alternative drainage system during construction of drains to reduce the inconvenience to the community and reduce the possibility of human-pollution interaction For oxidation ponds or septic 6 inches lining by puddle clay should at 	<p>Number of drains lined and converted into covered drains</p> <p>Alternative drainage system provided</p> <p>Number of oxidation ponds with 6 inches lining by puddle clay built/concrete/brick</p>	<p>As and when these are identified</p> <p>As and when this is needed</p>	<p>IP/PIU</p>	Included in staff costs and travel budget

		<ul style="list-style-type: none"> least be built if not concrete or brick lining Mechanisms exist for community to bring forth any complaints/feedback concerning the construction, use and maintenance of these facilities 	<p>lined, including fencing around ponds</p> <p>Record of community sensitization on GRM in place.</p>	<p>As and when these are identified</p> <p>Monthly</p>		
	Latrine usage and maintenance can be at risk should communities fail to recognize the health benefits linked to such technology	<ul style="list-style-type: none"> Locate facilities in a location that is safe for women, girls and young children to use without risks to safety and security Construct facilities in a manner that will be accessible to children and persons with disabilities 	<p>Checklist developed and used to identify safe locations</p> <p>Designed with provisions to allow for children's access and accommodates persons with disabilities</p>	<p>Monthly</p> <p>At design stage</p>	IP/PIU	Included in staff costs and travel budget
	Proliferation of vectors which increase the risk of epidemic outbreaks	<ul style="list-style-type: none"> Provide training for management and control of vectors to minimize the epidemic outbreak risk Provide training to participants for the operation and maintenance of the sanitation facilities (the training should include the identification of risks and mitigation measures) 	<p>No. of trainings provided</p> <p>No. of training sessions provided and No. of participants trained</p>	<p>Monthly</p> <p>Monthly</p>	IP/PIU	Included in staff costs

	Air Pollution	<ul style="list-style-type: none"> Conventional or flush latrines should be linked with P-traps Training of participants on the operation and maintenance of the sanitation facilities to ensure reduced air pollution, among others. 	No. of flush latrines linked with P-traps No. of training sessions provided and No. of participants trained		IP/PIU	Included in staff costs and travel budget
Health facilities						
	Health facilities due to poor working practices are one of the important sources of spread of different diseases in the community. Most important poor practices are: improper sterilization of equipment, reuse of used needles & syringes, and unsafe disposal of hazardous waste	<ul style="list-style-type: none"> Provide equipment for used needles and syringes crushing, and instruct management to practice the crushing of used needles and syringes Provide training for management and control of health waste Ensure good house keeping 	No. of equipment available and properly functioning an used for destruction of used needles and syringes No. of training sessions held and no. of personnel trained	Monthly Monthly	IP/PIU	Included in staff costs and travel budget
	Health waste can be a serious human hazard	<ul style="list-style-type: none"> or every three health projects, one incinerator shall be built at one of the health projects to ensure safe disposal of health care waste <p>Where possible, alternatives to incineration such as autoclaving, microwaving,</p>	Lines and covered pit available for disposal of health care waste One incinerator built at every three health projects	At construction stage	IP/PIU	Included in staff costs and travel budget

		steam treatment integrated with internal mixing, which minimize the formation and release of chemicals or hazardous emissions should be given consideration in settings where there are sufficient resources to operate and maintain such systems and dispose of the treated waste		At construction stage		
	Design, construction and operation of infrastructure can pose a safety risk for third parties and affected communities	<ul style="list-style-type: none"> Structural elements to be designed and constructed by competent professionals and certified and approved by competent professionals 	tbd			
	Public's potential exposure to operational accidents or natural hazards	<ul style="list-style-type: none"> Where the project involves provision of services to communities, establish and implement appropriate quality management systems to anticipate and minimize risks and impacts that such services may have on community health and safety. In such circumstances, also apply the 	The site specific management plan to address these parameters			

		concept of universal access, where technically and financially feasible.				
	Health and safety risks associated with fish processing and storage facilities	<ul style="list-style-type: none"> Follow GIIP guidelines set out in the EHSGs for fish processing 	GIIP guidelines followed	Monthly	PIU	Included in PIU staff costs
	Increased risk of GBV cases (including IPV) in community and at workplace, since activities in the fishing sector will directly benefit and likely empower women with improved livelihoods	<ul style="list-style-type: none"> Implement GBV Action Plan in AF activity locations 	GBV Action Plan implemented	monthly	PIU	Included in PIU staff costs
	Dam safety issues	<ul style="list-style-type: none"> Conduct study of critical water management infrastructure or dam safety assessment and undertake necessary actions 	Study conducted	Prior to activities	PIU	Included in PIU staff costs
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement						
ESS 5	Key public amenities may have been converted to formal and informal camps for accommodating persons displaced by the conflict, which will necessitate the relocation of already displaced people	<ul style="list-style-type: none"> If trees are to be cut for any subprojects, the farmer/beneficiary will carry out compensatory plantation of appropriate indigenous tree species. Trees thus planted will be at least four times the number of trees felled for 	Record of trees cut and planted, including dates and locations	Monthly	IP/PIU	Included in staff costs and travel budget

		establishing the subproject.			
Loss of assets, sources of income, or means of livelihoods	<ul style="list-style-type: none"> Implementation and monitoring of Resettlement Action Plan (RAP) 	Audit report	Monthly	IP/PIU	Included in staff costs
With weaker or nonexistent formal land administration authorities, processes for land expropriation compensation may not be in place or fully established. As a result, resettlement as well due diligence for establishing ownership for voluntary land donations may be challenging	<ul style="list-style-type: none"> Community consultations to be conducted before establishing facilities (SEP) 	Record of community meetings held, dates and places	Monthly	IP/PIU	Included in staff costs
Disputes over land ownership	<ul style="list-style-type: none"> Implement and monitor GRM 	No. of follow ups made and resolved	Weekly	IP/PIU	Included in staff costs and travel budget
Blocked access to people in the area	<ul style="list-style-type: none"> Ensure that the local routes, drainage and community access are not blocked by such schemes 	Zero complaint on blocked access to people in the area	Weekly	IP/PIU	Included in staff costs
Road construction and/or expansion/upgrade of Fisheries might require acquisition of land, houses, buildings and other physical infrastructure	<ul style="list-style-type: none"> Implementation and monitoring of Resettlement Action Plan (RAP) 	Audit report	Monthly	IP/PIU	Included in staff costs

	Encroachment on private and public land: Sub project activities may require land that is possible claimed or owned by someone.	<ul style="list-style-type: none"> Inform the concerned communities about detailed activity plan including alternate route during construction, secure community consent, and implement all the safeguards agreed with the community 	Record of stakeholder engagements and minutes	Early stages of the project	IP/PIU	Included in staff costs
	Firming up conflict over land ownership by making people need to claim land rather than share. Sub projects may require land, which may lead to individuals making land claim to proof land ownership prior to sub project commencement – in the hope of reimbursement, for example. This may foster conflicts over local land use, tenure and ownership, and also contradict encouragement of communities to share land	<ul style="list-style-type: none"> Engagement of higher authorities such as local council to iron out disputes and claims over land. 	Minutes of meeting with higher authorities to clear the disputes	Early stages of the project	IP/PIU	Included in staff costs

ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

Locust control						
ESS 6	The locust crisis intervention support through spraying may affect important natural	<ul style="list-style-type: none"> Implement and monitor PMP 	Record of monitoring PMP	Monthly	IP//PIU	Included in staff costs

	<p>resources or ecological functions on which local populations depend (e.g. bees provide honey, wax and the essential pollination of many crops but they are also very susceptible to insecticides. Many wasps, flies, spiders and beetles prey on crop pests; if these natural enemies are killed by insecticides, pests may become a problem for farmers)</p>	<ul style="list-style-type: none"> • Restrict use of obsolete pesticide stocks in the country • During campaign planning all areas in the country will be identified that are ecologically and agronomically important or particularly sensitive to insecticides. For each sensitive area, locust management options will be evaluated, based on the type of organisms at risk and the likely locust targets that may appear in the area. Subsequently, appropriate locust control techniques will be identified for each area. These include the decision to allow chemical control or not, the choice of acceptable insecticides, periods when treatments are or are not allowed, appropriate control methods, etc. Sensitive areas will be mapped with overlays of previous (or newly 	<p>Obsolete pesticides stocks in use and reason for use</p> <p>Report on mapping of sensitive areas with appropriate locust control techniques.</p>	<p>Early stages of the project</p>		
--	--	--	---	------------------------------------	--	--

		expected) locust infestations			
Other					
Sensitive areas may be impacted by project activities	<ul style="list-style-type: none"> Screening process will identify potential impacts on sensitive areas Avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas, implement RFP Site selection will include an analysis of the immediate area in terms of population, buildings, slope, nearby wadis/seasonal water flows, and will exclude those which may be adjacent to areas with environmental sensitivities 	<p>Screening report identifying protected areas</p> <p>Report indicating sites selected bearing in mind protected areas identified above.</p>	Early stages of the project	IP/PIU	Included in staff costs
Changes in land form and habitat, habitat fragmentation, blockage of migration paths, water consumption and contamination	<ul style="list-style-type: none"> Restore and landscape any affected areas 	No. of affected areas and their respective area coverage that will be restored and landscaped against total number affected	Monthly	IP/PIU	Included in staff costs and travel budget
Loss of precious ecological assets, if they are inappropriately located they could cause secondary	<ul style="list-style-type: none"> No or minimized removal of flora or wildlife in protected or sensitive areas shall be allowed 	Record of sensitization and attendance list		IP/PIU	Included in staff costs

	encroachment into historical/cultural buildings/areas, disrupt hydrology of natural waterways, regional flooding, and drainage hazards	<ul style="list-style-type: none"> • Ban use of firewood for fuel on any construction camps or areas • Ban hunting and game consumption on construction site and for all construction workers • Limit plant removal to grasses, weeds or small bushes • For any plant removal or tree felling, four replacement plants should be replanted 	<ul style="list-style-type: none"> - Record of instruction and - No fire wood is used <p>Record of sensitization</p> <p>No. of plants re-planted and location</p>	Monthly		
	Disturbance of natural habitats at clearing and construction of fish infrastructure.	<ul style="list-style-type: none"> • Survey the sub-project area before any works, to identify, categorize, and delineate natural and modified habitats and ascertain their biodiversity importance at the national or regional level • Ensure that the area to be used for construction of relevant infrastructure does not represent a habitat that is unique or protected (such as mangrove areas), or 	Survey results available	Prior to activity	PIU	PIU staff budget

		includes high biodiversity value, such as known sites of critically endangered or endangered species.				
	Unregulated Fishing: Lack of management of coastal fisheries may lead to further unregulated fishing and impacts such as overfishing	<ul style="list-style-type: none"> Provide training to fishing communities on sustainable fishing practices Fishers to sign Code of Conduct for Responsible Fisheries, setting out good practices for governments and fishers. 	<p>Training provided / participant list available</p> <p>Code of Conducts signed</p>	monthly	PIU	Included in PIU staff and travel budget
	Decline of fish stocks/fish species	<ul style="list-style-type: none"> Ensure effective community engagement and fishermen and discuss fishing methods among other parameters, in the quest to manage fish stocks in the water bodies Take precautionary approach. Provide training to fishers, Conduct data analysis and surveys on fish stocks based on existing biodiversity information Set harvesting limits as appropriate 	<p>Stakeholder engagement conducted / participants lists</p> <p>Training for fishers provided / participants lists</p> <p>Evidence of harvest limits</p>	monthly	PIU	Included in PIU staff and travel budget

<ul style="list-style-type: none"> ESS 8: Cultural Heritage 						
ESS 8	There is the potential for chance find of cultural or archeological significance during construction that could potentially be impacted from the construction	<ul style="list-style-type: none"> See Chance Find Procedures in annex 2 	Instruction on how to treat chance find	Monthly	IP/PIU	Included in staff costs
	Civil work activities could impact intangible cultural heritage (e.g. disruption of religious/cultural festivals, impacts on burial grounds etc.)		Record of impacted intangibles and by what activity	Monthly	IP/PIU	Included in staff costs
<ul style="list-style-type: none"> ESS 10: Stakeholder Engagement and Information Disclosure 						
ESS 10	Inadequate, ineffective and inappropriate stakeholder and community engagements and disclosure of information can lead to the exclusion of truly vulnerable, marginalized and minority members of the community from project benefits, amplified by the context of limited resources against widespread need	<ul style="list-style-type: none"> Implementation and monitoring of SEP 	Audit report against SEP implementation to show compliance levels	Monthly	IP/PIU	Included in staff costs
	Project benefits are diverted to less-deserving individuals					
	Poor access to beneficiaries lead to less			Weekly	IP/PIU	Included in staff costs

	meaningful community engagements and difficulty in monitoring for social harm	<ul style="list-style-type: none"> Implementation and monitoring of GRM 	No. of GRM cases addressed			
--	---	--	----------------------------	--	--	--

Monitoring Responsibilities

The responsibility for monitoring activities will mainly lie with the IP itself, where appropriate it will be conducted by MDAs at the state level (or SPTs respectively). Where this is the case, results will be reported to the PIU. The PIU has the overall responsibility for the appropriate monitoring of all risk mitigation measures and their indicators. The Environmental Specialist, the Social Specialist, as well as OHS and GBV staff of the PIU, as well as the E&S Safeguards Specialists of the SPTs, will conduct regular monitoring missions to project sites. This will include building the E&S monitoring capacity of the state-level SPTs and MDAs. At the same time, the PIU E&S staff will be supported through UNOPS environmental and social specialists.

Monitoring will consist of a rotational site visit plan, but also include spot checks. The monitoring plans will be developed in cooperation between the E&S staff at the PIU level and the SPTs and MDAs in the respective states.

Furthermore, IVAs' Project monitoring tasks and schedules will include E&S mitigation measures and their indicators. This will be integrated into the TOR for the IVAs recruited for the SCRP. IVA reporting, where relevant to E&S standards, will be submitted to the PIU.

Where monitoring and supervision of the implementation of E&S risk mitigation measures reveals non-compliance with this ESMF and other E&S instruments, the case will be reported by the E&S staff to the PIU Project Coordinator, and it will be detailed in the regular E&S reporting (see below). Non-compliance will be formally discussed with the IP or the respective party, and the IP will be requested to comply. Monitoring of the respective sub-project or site-specific activity will increase in frequency until full compliance is attested.

Where issues arise that are related to non-compliance of the IP/contractor, the IP will be financially liable for the costs of mitigation measures. Where issues arise that are beyond the responsibility of the IP, costs will be carried by the PIU.

If non-compliance persists, the PIU Project Coordinator, with advice from his E&S staff, can take the decision to cancel the activity and the contract of the IP. Provisions to this regard will be integrated into contractual agreements with contractors/IPs.

All detected non-compliance will be integrated into the quarterly E&S reporting, which will be submitted to the World Bank. If non-compliance reoccurs in a specific sub-project or site-specific activity, or through a specific IP, the World Bank has the right to request the cancellation of the contract / activity.

8.4. E&S Reporting

Reporting on E&S risk mitigation implementation, monitoring results and details of GRM cases and outcomes, will be included in quarterly reports from the PIU to the World Bank (see Annex 7 for outline of ESS reporting). The PIU Environmental Specialist and Social Specialist will be responsible to compile all data to be reported and to prepare reporting inputs to the PIU M&E officer two weeks prior to the quarterly reporting cycles. For analysis and interpretation of data they will also rely on subject matter experts, such as the OHS or GBV specialist.

The PIU will compile data from IPs, SPTs and MDAs, where applicable, as well as directly through IP and contractor reporting. IPs and contractors will be request in their contracts to provide monthly reporting on E&S issues.

9. Grievance Redress Mechanisms

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.¹⁴⁸ One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances’.¹⁴⁹ This Project GRM should facilitate the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SCRP will provide mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the SCRP.

As per World Bank standards, the GRM will be operated in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines (see GBV/SEAH and Child Protection Prevention and Response Plan). It will also operate in addition to specific workers’ grievance redress mechanisms, which are laid out in the LMP (annex 6).

The GRM are designed to capture the high potential for conflict in Somalia. There is concern that there may be disagreements over local level planning and implementation processes. Furthermore, the project itself may cause grievances, or existing community and inter-community tensions may play out through the project. The source of grievances in regards to project implementation can also sometimes be the very nature local governance or power distribution itself.

It will therefore be key in the fragile environment of South Sudan to ensure that grievances and perceived injustices are handled by the project, and that the project aides mitigating general conflict stresses by channeling grievances that occur between people, groups, government actors and beneficiaries and project staff, NGOs, CSOs or contractors. Aggrieved parties need to be able to refer to institutions, instruments, methods and processes by which a resolution to a grievance is sought and provided. The GRM provides an effective avenue for expressing concerns, providing redress, and allowing for general feedback from community members.

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

9.1. Assess and Clarify

Through radio, mobile phones, community meetings, email and websites information about the Project and its sub-component activities will be publicly disclosed (see above).

¹⁴⁸ Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labour Management Plan (LMP). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV grievance redress mechanisms, which will be defined in a separate GBV/SEA and Child Protection Risks Action Plan.

¹⁴⁹ World Bank, Environmental and Social Framework, 2018, p. 131.

The type of information disclosed includes details about the Project structure, activities, budgets, consultation and information disclosure plans (SEP), the Environmental and Social Commitment Plan (ESCP), the Environmental and Social Management Framework (ESMF), activity-specific Environmental and Social Assessments (ESAs), activity-specific Environmental and Social Management Plans (ESMPs), the GBV/SEAH and child protection referral systems, as well as detailed information about the Project GRM.

Based on the information made available, aggrieved parties can decide whether they have a case to report or whether the available information clarifies their concern. This will allow the aggrieved party to decide on the appropriate next step in order to report a grievance, comment, or provide feedback to the Project.

The provision of multiple grievance channels allows an aggrieved party to select the most efficient institution, accessibility, circumvent partial stakeholders, and creates the ability to bypass channels that are not responsive.

9.2. Intake, Acknowledge and Follow-Up

Grievances received through the GRM will be taken in by the respective IP. The Hotline Operator reviews information received and transfers it to the respective IP; Community Project facilitators will file grievances and pass them to the respective IP at state or national level. Community facilitators will also man the help desks or be responsible for suggestion boxes. All cases received through these, the community facilitator reports to the IP. All cases will thereby be treated confidentially.

Incident reporting. Severe incidents (an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, e.g. fatality, GBV, forced or child labor) will be reported by the IP - within 24 - to the PIU and the World Bank.

Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the IP has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GRM operators and relevant project staff.

For all other grievances, the respective IP will decide whether the grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to address the appropriate individuals, if the case can be solved at the local level.

At all times, the IP will provide feedback promptly to the aggrieved party, for example through the phone or through the community facilitator. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Records of all feedback and grievances reported will be established by the IP. All feedback is documented and categorized for reporting and/ or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible, should include the name of the person provided feedback, district, State, cooperating partner where applicable, project activity, and the nature of feedback or complaint.

9.3. Verify, Investigate and Act

The IP will investigate the claim within 5 working days and share findings with relevant stakeholders. Where an incident was reported, the IP will, in addition, follow the incident management protocol. Verification and management of GBV/SEAH related grievances will follow specific, differentiated processes outlined in the GBV/SEAH and Child Protection Prevention and Response Plan.

Where a negotiated grievance solution is required, the IP will invite the aggrieved party (or a representative) and decide on a solution, which is acceptable to both parties and allows for the case to be closed – based on the agreement of both parties.

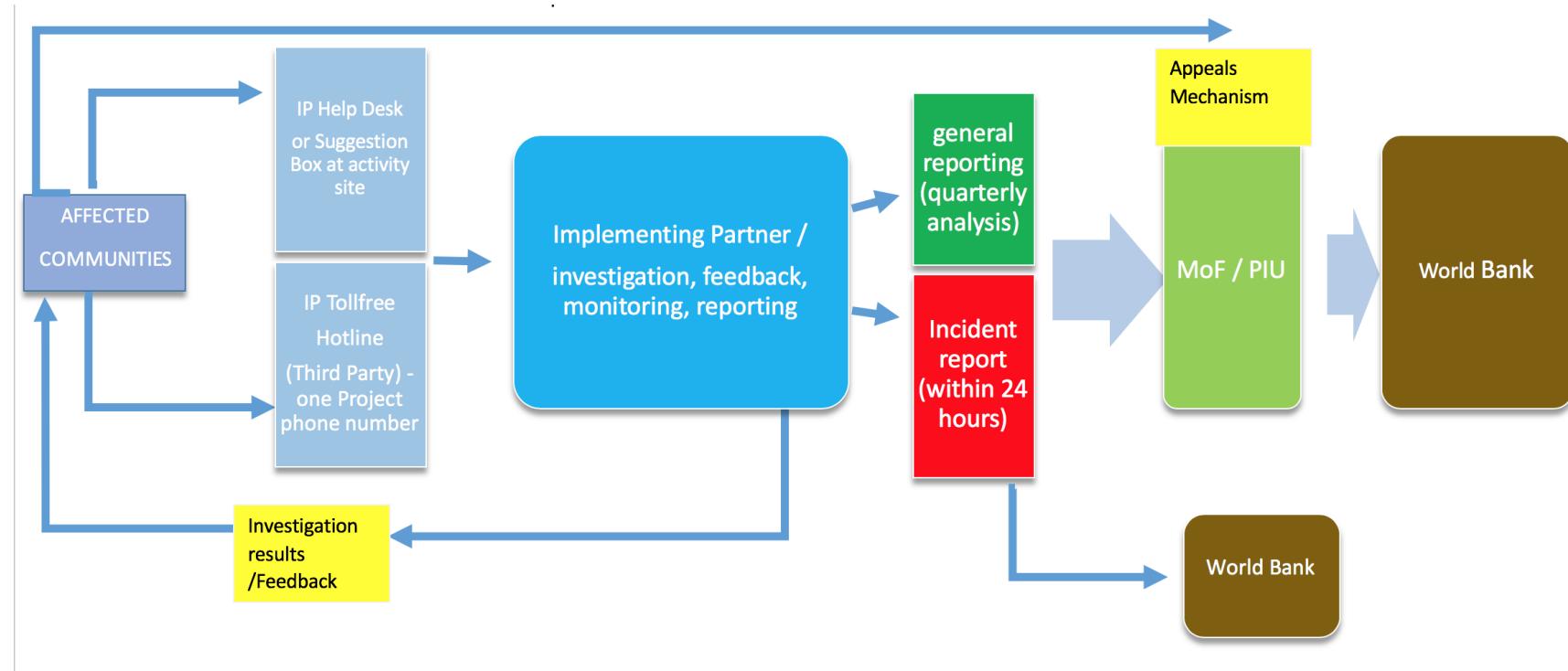
After deciding a case, the IP has to provide an appeals mechanism to the aggrieved party, which is constituted through the PIU. This is important in cases in which the aggrieved party is dissatisfied with the solution provided by the IP. In these instances, the PIU will step in and provide an appeals mechanism. The appeal should be sent to the PIU directly (a phone number will be provided), where it will be reviewed by the PIU Risk Management Unit and will be decided on jointly with the Head of the PIU. Where aggrieved parties are dissatisfied with the response of the PIU, they can report cases directly to the World Bank (see below).

9.4. Monitor, Evaluate and Feedback

The 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.

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.

9.5. SCRP Grievance Redress Mechanisms Flowchart



9.6. Monitoring and Reporting of GRM

The PIU, specifically the Social Specialist, will be responsible for the monitoring of the availability and implementation of the GRM by all IPs. The Specialist will include the GRM into his supervision and monitoring missions to the field and conduct spot checks in regards to its implementation, or, where access is difficult recruit IVA to do so.

IPs will provide analytical synthesis reports on a quarterly basis to the PIU, which include the number, status and nature of grievances. These reports will form the basis of all regular reports from the PIU to the World Bank.

IPs will further provide an excel sheet summary of the feedback and grievances reported, which will be linked to the Project's Management Information System (MIS) and to the M&E Results Framework. They will further maintain a documented record of stakeholder engagements, including a description of the stakeholders consulted, a summary of the feedback/grievances received during community consultations.

The PIU will further extract lessons learnt from the GRM and implement analysis on the overall grievances, and share them with all IPs.

This ESMF has been updated to cater for instances in which IPs have an existing GRM. Experience during the first few months of project implementation has shown that a significant number of IPs have their own GRM, which is usually already in operation and contains elements such as Hotlines. For this reason, a GRM Checklist has been added to this ESMF (see Annex 20).

9.7. GBV, Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

Cases of GBV/SEAH can be reported through the general Project GRM. However, additional channels for reporting GBV/SEAH complaints will be identified and integrated into the GRM (see annex 4) GBV/SEAH and Child Protection Risk Action Plan. The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager. Given to the sensitive nature of GBV complaints, the GRM will provide different ways to submit grievances such as phone, text message and email. All relevant staff of the PIU and IPs will receive training on receiving GBV complaints and referral systems, ideally during the project initiation phase and as part of the staff welcome package. The GRM Operators will be trained on key protocols including referral, reporting and informed consent protocols to receive those cases in an appropriate manner and immediately forward it to the GBV/SEAH referral system. The GRM Operator will ensure appropriate response by 1) providing a safe caring environment and respect the confidentiality and wishes of the survivor; 2) If survivor agreed, obtain informed consent and make referrals, 3) provide reliable and comprehensive information on the available services and support to survivors of GBV.

The GRM should consider to include key features on prevention of GBV: 1) Establish quotas for women in community level grievance management to facilitate safe reporting, 2) provide multiple channels to receive complaints (channels to be determined after community consultation) 3) Resolving complaints at the point of service delivery to reduce information and transaction costs and gender sensitive independent channels for redress. 4) Communicate GRM services at the community level to create GBV awareness and enable project-affected people to file complaints.

Beneficiaries and communities should generally be encouraged to report all GBV/SEAH cases through the dedicated GBV/SEAH 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/SEAH referral system will guarantee that survivors have access to necessary services they may need, including medical, legal, counselling, and that cases are reported to the police should the survivor choose to do so. Formal processes for disclosing, reporting, and responding to cases of GBV/SEAH will be articulated within the GBV/SEAH and Child Protection Risk Action Plan.

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/SEAH to the World Bank within 24 hours following informed agreement by the survivor. Furthermore, cases of SH should be reported through the workers' GRM, 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. 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 in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

9.8. WB's Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

10. Capacity Development and Training Schedule

The PIU will conduct an E&S capacity assessment of each IP to assess whether the IP has the appropriate staff, systems and structures in place to implement all necessary E&S mitigation measures. A questionnaire for the capacity assessment of IPs is attached in Annex 21.

Furthermore, an important output of the implementation of Component 1 activities will be the strengthening of capacities of FMS institutions participating in the project in community engagement and project design, implementation and oversight.

Capacity Building and Training Plan						
Objectives	Issues for engagement	Method of engagement	Stakeholders/ Target population and area	Responsible entity	Time frame	Costs in USD
ESMF, including all associated instruments	Increasing knowledge and capacity to implement the ESMF	Training	Training of PIU, SPTs, MDAs, IPs in the ESMF Specific training will be provided to SPTs to facilitate potential handover of responsibilities	PIU	Prior to commencement of activities and throughout lifetime of the Project	250,000
GBV/SEA and Child Protection Action Plan	Increasing knowledge on the handling of GBV cases and the GBV Action Plan	Training	Training of PIU, SPTs, MDAs, IPs in the ESMF, GBV/SEAH Focal Points Training of GRM operators	PIU	Prior to commencement of activities	100,000
GBV Procedures for Reporting and Prevention	Training and monitoring during project implementation to prevent GBV and support reporting of cases	Training	Community members / vulnerable groups	CSOs/IPs	During project implementation	100,000

Project GRM	Training and monitoring during project implementation	Training / awareness	Training of PIU, SPTs, MDAs, IPs in the ESMF Training of GRM operators Community groups/vulnerable groups	PIU / IPs	Prior to and during project implementation	100,000
Mitigate impact of workers on local communities (LMP and GBV/SEAH and Child Protection 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 / awareness	Project Workers	IPs	Prior to construction work	IP budget
H&S standards	H&S Standards for workers	Training / awareness	Project Workers	IPs	Prior to construction work, ongoing throughout construction and specific training to those with high risks	IP budget
Health Care Waste	Health Care Waste management	training	Nurses and other health workers	IPs	Prior to implementation	IP budget
WASH	Sanitation facilities – cleaning and hygiene	training	Communities / vulnerable groups	IPs	During project implementation	IP budget

11. Resources and Budget¹⁵⁰

	Required Resources	Costs in USD
PIU – Monitoring of ESMF		
1.	Human Resources: 1 Environmental, 1 Social Specialist (48 months x 2 x 7000 USD)	672,000
	1 GBV Specialist (48 months x1x 7000 USD)	336,000
	1 OHS consultant (48 months x1x 4,500 USD)	216,000
	1 Security Specialist (48 months x1x 7000 USD)	360,000
2.	Logistics / Travel	200,000
Grievance Redress Mechanism hotline		
3.	Hotline and other mechanisms	500,000
	GBV/SEAH reporting mechanisms	100,000
Implementation of Risk Mitigation Measures PIU		
3.	Human Resources	See above
4.	Logistics/Travel	
5.	Monitoring and SEP implementation (SEP has a separate budget)	200,000
6.	Security Management (Security Management Company on general budget)	n/a
7.	Implementation of GBV Action Plan / GBV Service Provider	600,000
12	Capacity Development and Training (except items on IP budgets)	550,000
	TOTAL	3,518,000

¹⁵⁰ This table does not include items, such as E&S specialists deployed by IPs, preparations of ESMPs and ESIAs where required, independent supervision, UNOPS or FAO assistance with ESS (on UNOPS and FAO budgets), construction cost related E&S management (on IP budget).

12. References

Agriculture and Somalia's Crisis, 2013 at: <http://www.fao.org/3/as787e/as787e.pdf>

Anyah, R. O. and Semazzi, F. H. M., 'Climate variability over the Greater Horn of Africa based on NCAR AGCM ensemble', *Theoretical and Applied Climatology*, vol. 86, no. 1–4, Sep. 2006, pp. 39–62.

DfID Somalia, Drivers of Conflict, 2005

FAO, Somalia Humanitarian Response Plan 2020, accessed at: <http://www.fao.org/3/ca7825en/CA7825EN.pdf>

FAO, Locust Watch: Desert Locust Outbreaks, accessed at: <http://www.fao.org/ag/locusts/en/archives/1032/index.html>

FAO, 'Somalia floods update', 7 May 2018

FAO-SWALIM, [Somalia Outlook for 2020 Gu](#), Feb. 7, 2020

FEWS Net, Desert locust and Floods pose a Risk of Crisis (IPC Phase 3) outcomes in more areas by mid-20, accessed at: <https://fews.net/east-africa/somalia/food-security-outlook/february-2020>

FEWS Net, Heavy Gu Rainfall leads to heavy flooding, May 11, 2018, accessed at: <https://fews.net/east-africa/somalia/alert/may-2018>

FGS, Ministry of Education, Culture and Higher Education, Education Sector Strategic Plan 2018-2020

FGS and The World Bank, Somalia. 2019 Flood Impact and Needs Assessment, February 2020

Fisheries in the ESA-IO Region: Profile and Trends (Somalia), 2014

Food & Agriculture Organisation, 2005

Fragile State Index 2019, accessed at: <https://fragilestatesindex.org/data/>

Gardener, J. and J. El-Bushra, The impact of war on Somali men and its effects on the family, women and children, Rift Valley Institute, 2015

Gardner, J., Changing Roles and Responsibilities in the Family, In *Somalia – The Untold Story: The War through the Eyes of Somali Women*, ed. Judith Gardner and Judy El Bushra, 99–106, 2004, London: CIIR and Pluto Press.

Gomes, N., Access to water for pastoral resources management, 2006

Implementation of the Beijing Platform for Action. Beijing +20 Review. Somalia Country Report 2014

ILO, Decent Work Programme, Somalia 2011-2015

IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at: <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>

IASC, Policy. Gender Equality and the Empowerment of Women and Girls in Humanitarian Action, November 2017

IGAD, Somalia. Land Governance Country Profile, Assessment of Land Governance Framework, Training & Research Land Governance Institutions, accessed at: <https://land.igad.int/index.php/countries/39-countries/somalia/40-somalia-profile?showall=1>

Ibrahim, R. M., Women's Role in the Pastoral Economy." In *Somalia – The Untold Story: The War through the Eyes of Somali Women*, ed. Judith Gardner and Judy El Bushra, 24-50, 2004, London: CIIR and Pluto Press.

Improving Development and Management of Somalia's Marine Fisheries and Controlling Illegal, Unreported and Unregulated (IUU) Fishing, 2015

Internal Displacement Monitoring Center, The Ripple Effect. Economic Impacts of Internal Displacement. Case Studies in Eswatini, Ethiopia, Kenya and Somalia, Thematic Series, January 2020

Lewis, I.M., A Pastoral Democracy, 1961

Lewis, I.M., Understanding Somalia, 1998

LOGICA, Gender and Conflict Note Somalia, March 2013, accessed at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/03/31/000333037_20140331154002/Rendered/PDF/862980BRI0Box30gica0DissNoteSomalia.pdf

Ministry of National Resources, *National Adaptation Programme of Action on Climate Change (NAPA)* (Federal Republic of Somalia: Mogadishu), Apr. 2013.

NAFIS Network/MOLSA, Assessment of the Prevalence, Perception and Attitude of Female Genital Mutilation in Somaliland, 2014

Natural Resources & conflict management- the case of Land, Economic Commission for Africa Sub-Regional Office for Eastern Africa, SRO-EA, 2012

OCHA, Humanitarian InSight Somalia 2019, Humanitarian Response Plan. 2019

OECD Development Center, Social Institutions and Gender Index, 2014, accessed at: http://genderindex.org/ranking?order=field_sigi_value14_value&sort=asc

Ogallo, L. A. et al., 'Land cover changes in Lower Jubba Somalia', *American Journal of Climate Change*, vol. 7, no. 3 Sep. 2018, pp. 367–87.

Osman, Mohamed Amin AH, Somalia, proposals for the future, 1993, SPM. pp. 1–10.

Pact, American Bar Association, USAID, Expanding Access to Justice Program, Gender Assessment, 2019.

ReDSS, Forced Evictions as an obstacle for durable solutions in Somalia, March 2018, accessed at: <http://regionaldss.org/wp-content/uploads/2018/03/Forced-evictions-as-an-obstacle-to-durable-solutions-210318.pdf>

Report of the Secretary-General on Somalia, Dec 2019, Security Council, S/2019/884

Rift Valley Institute / Heritage Institute, Land Matters in Mogadishu. Settlement, Ownership and Displacement in a contested city, 2017

Sanya, J and I. Mwenda, Mogadishu. When Checkpoints don't work, Horn International Institute for Strategic Studies, accessed at: <https://horninstitute.org/mogadishu-when-checkpoints-dont-work/>

Save the Children, 'The Urban Disadvantage. State of the World's Mothers 2015', Fairfield 2015

Security Council Report, Final Report of the Panel of Experts on Somalia, S/2019/858

Somalia Humanitarian Country Team, 2019, Humanitarian Needs Overview, accessed at: https://reliefweb.int/sites/reliefweb.int/files/resources/Somalia_2019_HNO.PDF

Somalia Water and Land Information Management (SWALIM) and Food and Agriculture Organization of the United Nations (FAO), 'The Juba and Shabelle rivers and their importance to Somalia', 2016.

Somalia Country Economic Memorandum; *Rebuilding Resilient and Sustainable Agriculture in Somalia*, 2018

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/>

Somali Core Economic Institutions and Opportunities Program ESMF, 2017

Somalia Drought Impact Response Plan, 2019, accessed at: <https://reliefweb.int/report/somalia/somalia-2019-drought-impact-response-plan-dirp>

Somalia Water and Land Information Management (SWALIM) and Food and Agriculture Organization of the United Nations (FAO), 'The Juba and Shabelle rivers and their importance to Somalia', 2016

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

The World Bank, Environmental and Social Framework, 2018

The World Bank, UN Somalia, UN Habitat, Youth as Agents of Peace in Somalia, 2018

The World Bank, Somalia Clears Arrears to World Bank Group, Press Release March 5, 2020, accessed at: <https://www.worldbank.org/en/news/press-release/2020/03/05/somalia-clears-arrears-to-world-bank-group>

The World Bank, Somali Poverty and Vulnerability Assessment, Findings from the Wave 2 of the Somali High Frequency Survey, April 2019

Thulstrupa, A. W. et al., 'Uncovering the challenges of domestic energy access in the context of weather and climate extremes in Somalia', *Weather and Climate Extremes*, Sep. 2018

UN Monitoring Group for Somalia and Eritrea, *Report of the Panel of Experts on Somalia submitted in accordance with resolution 2444 (2018)*, S/2019/858 (1 November 2019), available from <https://undocs.org/S/2019/858>

United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners, accessed at: https://www.un.org/preventing-sexual-exploitation-and-abuse/sites/www.un.org.preventing-sexual-exploitation-and-abuse/files/un_protocol_on_sea_allegations_involving_implementing_partners_en.pdf

UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

UN Environment Programme (UNEP), *Africa Water Atlas*, Nairobi, 2010

UNEP, State of Environment in Somalia, 2005

UNFPA, December 2016, Somalia: Gender Based Violence Sub-cluster Bulletin, accessible at https://somalia.unfpa.org/sites/default/files/pub-pdf/Dec_GBV%20Bulletin%20%283%29.pdf;

UNFPA, August 2015, Somalia: Gender Based Violence Sub-cluster Bulletin, accessible at <https://reliefweb.int/report/somalia/somalia-gbv-sub-cluster-bulletin-1-january-august-2015>

Somalia Humanitarian Country Team, 2019, Humanitarian Needs Overview, accessible at https://reliefweb.int/sites/reliefweb.int/files/resources/Somalia_2019_HNO.PDF;

Somali Core Economic Institutions and Opportunity Programme (SCORE), Environmental and Social Management Framework – ESMF

UNFPA, September 2016, Somalia Gender Based Violence Sub-Cluster Bulletin, accessible at <https://somalia.unfpa.org/en/publications/somalia-gender-based-violence-sub-cluster-bulletin>;

UNFPA, The Somali Youth in Figures, August 2016, accessed at: https://somalia.unfpa.org/sites/default/files/pub-pdf/INFOGRAPHIC_YOUTH%20DAY%20%282%29.pdf

UNFPA, Flood Response Situation Report, November 2019

UNFPA, September 2016, Somalia Gender Based Violence Sub-Cluster Bulletin, accessible at <https://somalia.unfpa.org/en/publications/somalia-gender-based-violence-sub-cluster-bulletin>;

UNFPA, December 2016, Somalia: Gender Based Violence Sub-cluster Bulletin, accessed at https://somalia.unfpa.org/sites/default/files/pub-pdf/Dec_GBV%20Bulletin%20%283%29.pdf;

UNFPA, August 2015, Somalia: Gender Based Violence Sub-cluster Bulletin, accessible at <https://reliefweb.int/report/somalia/somalia-gbv-sub-cluster-bulletin-1-january-august-2015>

UNICEF, Child Protection, 2020, accessed at: <https://www.unicef.org/somalia/child-protection>

UNICEF, Community Care: Transforming lives and preventing violence, 2017

UNICEF, Preventing and Responding to Violence against Children and Adolescents. Theory of Change 2017

UNICEF 'Sexual Violence as a Weapon of War, accessed at: <http://www.unicef.org/sowc96pk/sexiol.htm>

UNICEF Somalia Country Office, Water, Sanitation & Hygiene (WASH) Profile, February 2020, p.2, accessed at: <https://www.unicef.org/somalia/media/1251/file/Somalia-wash-profile-February-2020.pdf>

UNICEF and World Health Organization, Joint Monitoring Program, 2019, accessed at: . <https://washdata.org/data#!/som>.

UNICEF and World Health Organization, Joint Monitoring Program, 2019, accessed at: . <https://washdata.org/data#!/som>.

UNICEF Somalia Country Office, Water, Sanitation & Hygiene (WASH) Profile, February 2020, p.2, accessed at: <https://www.unicef.org/somalia/media/1251/file/Somalia-wash-profile-February-2020.pdf>

WHO, Somalia, Country Cooperation Strategy at a Glance, 2018, p.1, accessed at: https://apps.who.int/iris/bitstream/handle/10665/136871/ccsbrief_som_en.pdf;jsessionid=01FEF030DB9DD0DE3F6C832FEF64EDCD?sequence=1

WHO, Children. Reducing Mortality, factsheet, accessed at: <https://www.who.int/news-room/fact-sheets/detail/children-reducing-mortality>

WHO, Humanitarian Response Plan 2015, accessed at: <https://www.who.int/hac/donorinfo/somalia.pdf>

Williams, A. P. and Funk, C., 'A westward extension of the warm pool leads to a westward extension of the Walker circulation, drying eastern Africa', *Climate Dynamics*, vol. 37, no. 11–12, Dec. 2011, pp. 2417–35.

World Food Programme, Somalia Country Brief, 2021

Annex 1: Environmental and Social Risk Categories and Screening Template

Risk Categories

The below listed risk categories will be applied during the E&S Screening process of sub-projects or site-specific activities. The categories will help guide on risk levels and will help guide on the decisions which additional E&S instruments are required for the respective sub-project.

Risk Category	Nature of Risk and Impact	Examples
Category D: Low Risk	Activities that do not have a physical footprint. These will not require E&S instruments preparation, however, E&S clauses in the contract are recommended (to be prepared by the PIU prior to bidding process)	Foot paths; Purchase of furniture for existing health clinics; haffirs for animal and human consumption; communication and translations; Small training and workshops; management of funds and grants; management of social protection activities
Category C: Moderate Risk	Activities that have low to medium E&S risks and impacts, including that are site specific, temporal and reversible in nature. In addition to the E&S clauses in the contract, these activities may require an ESIA that will collate findings into a detailed ESMP. Contractors will also be required to prepare C-ESMPs. Furthermore activities may require risk mitigation measures laid out in the GBV Action Plan, Security Management Plan, Labor Management Procedures, Pest Management Plan, etc... (see screening template)	Construction or repair of non-motorized hand-pumps and boreholes (boreholes will be improvements or change to an existing water scheme); tanks; dug wells; provision or repair of latrines for public use; construction of flood protection infrastructure; repair of flood protection infrastructure; repair of small-scale community irrigation schemes; repair of small-scale irrigation schemes; rehabilitation of local roads; repair of local roads; culverts; bridges; repair or extension of existing health clinics; general buildings with local materials; markets; livestock dips; activities with security implication for all project workers and project-affected parties; activities with a risk of diversion of funds; activities that may spark conflict over allocation of resources; activities leading to involuntary resettlement, land acquisition and restrictions to land use; etc...
Category B: Substantial	Activities that have substantial E&S risks and impacts, including those that are not as complex as high risk projects, more	Activities that include potential security risks, such as delivery of goods to insecure areas; activities that could lead to GBV (e.g. labor influx)

	temporary in nature and more predictable and reversible. This category includes risks of limited degrees of social conflict, and impacts on human security; impacts that are medium in magnitude, medium to low probability of serious adverse effects to human health and/or environment.	
Category A: High Risk	Subprojects that contain significant environmental and social risks impacts. These subprojects would require a full ESIA and a detailed ESMP. They would also require an ARAP or a RAP depending on the number of Project Affected Persons (PAPs) and resettlement impact anticipated. UNOPS and IOM will avoid these projects and include them in the exclusion list.	dams; power stations; industrial installations (refineries, chemical installations); long distance roads, transmission lines (water, power); waste treatment and disposal installations; large water and wastewater treatment plants; river basin or land development; large-scale irrigation ; projects in critical habitat and protected areas; projects involving significant quantities of hazardous substances; industrial installations (refineries, chemical installations)

E&S Screening Template

Social and Environmental Screening Template - SCRP	
<p>Projects are screened for their inherent social and environmental risks regardless of planned mitigation and management measures. It is necessary to identify potential inherent risks in the event that mitigation measures are not implemented or fail. This means that risks should be identified as if no mitigation or management measures were to be put in place.</p>	
SECTION A: General Information	
Date of screening	
Activity/Sub project title	
Activity/Sub project component	
Implementing Partner	
Proposed activity duration	
ES Screening Team Leader and Contact Details	
ES Screening Team Members	
Site/Activity location	
New/Rehabilitation project	
Project Description. Briefly describe project activities	
Categorize Project Activities into List A or List B or List C (see above)	

Potential Environmental/Social Risks Impacts of Activities					
Risk Category (Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	I don't know	If these risks ('yes') are present, refer to:	Comments
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is an Environmental and/or Social Assessment required where project is undertaken?				ESMF	
Is there a risk of diversion of project benefits?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity?				Security Management Plan (SMP)	
Is there a risk that project benefits may not reach truly vulnerable populations?				Floods Impact Needs Assessment (FINA) Stakeholder Engagement Plan (SEP)	
Is there a risk that the activity will cause population influx from neighboring areas?				Floods Impact Needs Assessment (FINA) Stakeholder Engagement Plan (SEP)	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?				Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
ESS 2: Labor and Working Conditions					
Does the activity include any of the known labor rights / ESS 2 non-compliance risks in Somalia (child and forced labor)?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include a construction component?				Labor Management Procedures (LMP) C-ESMP Occupational Health and Safety Plan (OHS)	
Does the activity include primary agricultural activities?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Will the activity require a larger contractor workforce? (above 100) Please indicate how many externally recruited workers will be involved.				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for Project Workers?				Security Management Plan (SMP)	
Is there a risk of lacking OHS for workers at the construction site?				Occupational Health and Safety Plan (OHS) Pest Management Plan (PMP)	

Is there a risk of delayed payment of workers?			Labor Management Procedures (LMP)	
Is there a risk that workers are underpaid?			Labor Management Procedures (LMP)	
ESS 3: Resource Efficiency and Pollution Prevention Management				
Will the activity result in the production of solid waste? (directly by the project or by workforce)			Waste Management Plan, based on <i>WBG Environmental, Health, and Safety General Guidelines</i> Pest Management Plan (PMP) C-ESMP	
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceuticals, industrial chemicals, ozone depleting substances)			C-ESMP	
Will the activity result in significant generation of dust and noise?			C-ESMP	
Will the activity result in soil erosion?			C-ESMP	
Will the activity produce effluents (waste water)?			Waste Management Plan	
Will the activity result in siltation and/or contamination of the water body?			C-ESMP	
Will the activity result in increased levels of vibration from construction machinery?			C-ESMP	
Will the project produce air pollution? (e.g. significant greenhouse gas emissions, dust emissions and other sources)			C-ESMP	
Will the activity disturb any fauna and flora?			C-ESMP	
Will the activity result in irrigation water with high TDS with more than 1,500 ppm?				
Can the project affect the surface or groundwater in quantity or quality? (e.g. discharges, leaking, leaching, boreholes, etc.)			C-ESMP Waste Management Plan	
Will the project require use of chemicals? (e.g. fertilizers, pesticides, paints, etc.)				
Is there any risk of accidental spill or leakage of material?				
ESS 4: Community Health and Safety				
Is there a risk of community exposure to pesticides?			Pest Management Plan (PMP)	
Is there a risk of communal drinking water pollution through pesticides?			Pest Management Plan (PMP)	
Is there a risk of increased GBV/SEAH cases due to labor influx?			GBV/SEAH Action Plan Labor Management Procedures (LMP)	

Is there a risk of spread of communal diseases due to labor influx?				Labor Management Procedures (LMP) C-ESMP	
Is there a security risk to the community triggered by project activities?				Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the activity include payments or cash transfers?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the activity expose community members to physical hazards on the project site?				C-ESMP	
Will the activity pose traffic and road safety hazards?				C-ESMP	
Will the activity include debris removal that may pose a safety hazard for the community?				Waste Management Plan	
Is there a possibility that the activity contaminates open wells?				Waste Management Plan C-ESMP	
Is there a possibility that the activity spreads pathogens and other pollutants (eg latrines)				Waste Management Plan C-ESMP	
Can the activity contribute to the spread of disease (eg health facilities)?				Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the displacement / resettlement affect IDPs?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to disputes over land ownership?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to blocked access to people in the area?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity require acquisition of land or physical buildings or infrastructure?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					

Are pesticides used in the activity likely to affect important natural resources or ecological functions?			Pest Management Plan (PMP)	
Will the activity impact sensitive areas?				
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?				
Is there a risk that the activity causes loss of precious ecological assets?				
ESS 8: Cultural Heritage				
Will the project be located in or close to a site of natural or cultural value?			Chance Find Procedures (ESMF)	
Is the project site known to have the potential for the presence of cultural and natural heritage remains?				
ESS 10: Stakeholder Engagement and Information Disclosure				
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?			Stakeholder Engagement Plan (SEP)	
Is there a historical exclusion of disabled persons in the area?			Stakeholder Engagement Plan (SEP)	
Is there a lack of community consultations by the government generally?			Stakeholder Engagement Plan (SEP)	
Are women likely to participate in decision-making processes in regards to the activity?			Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?			Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Is there a risk that the activity will have poor access to beneficiaries?			Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Will the Covid-19 outbreak hamper proper stakeholder engagement?			WB and FGS guidance and regulations on Covid-19	

SUMMARY OF THE SCREENING PROCESS

E&S Screening	Results and Recommendation		
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Individual Risk/ Impact Rating	Mitigation
			At the end of the screen process, tabulate the mitigation measures in an ESMP Format (see below)

	Eg Land Degradation	Low	Rehabilitation of worked out areas.
Is Additional Assessment Necessary? Evaluate the Risks/Impacts and reflect on options (see below)	Screening Result 1. No1. No further ES Assessment required. 2. No 2. No further ES Assessment required but requires simple ESMP. 3. Yes 1. Detailed ESMP. Done internally. 4. Yes 2. Detailed ESMP. Contracted to Consultancy. 5. YES 2. ESIA required. Contracted to consultancy.	Summary of Screening Result Justification	

POSSIBLE SCREENING OUTCOMES AND REQUIRED ACTIONS

E&S Screening		Results and Recommendation	
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Mitigation	
	Eg Land Degradation	Rehabilitation of worked out areas.	
	Eg Occupational Safety and Health	Use of appropriate PPE.	
	Eg. Destruction of crops during trenching	Engage the Project Affected Persons. Trench off cropping season. Compensate fully where you cannot avoid.	
Is Additional Assessment Necessary?	Screening Result	Summary of Screening Result Justification	
	6. No1. No further ES Assessment required.		
	7. No 2. No further ES Assessment required but requires simple ESMP.		
	8. Yes 1. Detailed ESMP. Done internally.		
	9. Yes 2. Detailed ESMP. Contracted to Consultancy.		
	10. YES 2. ESIA required. Contracted to consultancy.		

Next Steps	Screening Result		Action. Select applicable action consistent with the Summary of Risks. All end results of the screening and follow up tools should be disclosed at the appropriate level.					
	1. No 1. No further ES Assessment required.		Proceed to project implementation in compliance with LMP, GRM, GBV/ Action Plan, SEP.					
	2. No 2. No further ES Assessment required but requires simple ESMP.		<ol style="list-style-type: none"> 1. Produce the ESMP and submit it with Screening Form for review and approval by PIU. 2. Proceed to project implementation in compliance with LMP, GRM, GBV/ Action Plan, SEP. 					
	3. Yes 1. Detailed ESMP. Done internally.		<ol style="list-style-type: none"> 1. Submit the Screening form with the TORs for the ESMP for review and approval by PIU. 2. Produce the ESMP and submit to PIU for review and approval by PIU. 3. Ensure the detailed ESMP mainstreams the LMP, GRM, GBV/ Action Plan, SEP. 4. Do not implement works until approval of the ESMP by PIU, World Bank. 					
	5. Yes 2. Detailed ESMP. Contracted to Consultancy		<ol style="list-style-type: none"> 1. Submit the Screening form with the TORs for the ESMP for review and approval by PIU. 2. Engage a Registered ESIA Consultant to produce ESMP and submit to PIU first for initial review, then to World Bank for review and approval. 3. Ensure the ESMP mainstreams the LMP, GRM, GBV/ Action Plan, SEP. 4. Do not implement works until approval of the ESMP by PIU, World Bank. 					
	5. YES 2. ESIA required. Contracted to Registered Consultancy.		<ol style="list-style-type: none"> 1. Submit the Screening form with the TORs for the ESIA for review and approval by PIU. 2. Engage a ESIA Consultant to produce ESMP and submit to PIU first for initial review, then to World Bank for review and approval. 3. Ensure the detailed ESMP mainstreams the LMP, GRM, GBV/ Action Plan, SEP. 4. Do not implement works until approval of the detailed ESMP by PIU, World Bank. 					

APPENDIX C: FORMAT FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN

Associated Activity	Project Impact	E&S Risks and	Mitigation Measures	Responsibility for implementation	Timing for mitigation	Monitoring Indicators	Mitigation Budget	Monitoring Responsibility	Monitoring Frequency
Gravel Borrow area for road rehabilitation	Land degradation	Rehabilitate all borrow areas	Contractor	Project implementation	Borrow areas rehabilitated	Contractor's Bid	TA-UNOPS PIU	TA-On going. PIU-Works Completion	

Negative Project List:

The following activities or purchased cannot be financed under the SCRP:

- ❖ Weapons, including but not limited to mines, guns, ammunition and explosives;
- ❖ Chainsaws;
- ❖ Support of production of any hazardous goods on this negative list, including alcohol, tobacco, arms, and controlled substances
- ❖ Any construction in the protected areas;
- ❖ Any activity with impacts on critical habitats;
- ❖ Consumption items or events;
- ❖ Activities, equipment or materials that have alternative prior sources of committed funding;
- ❖ Political or electoral campaign materials or donations in any form;
- ❖ Salaried activities that employ children below the age of 18 years;
- ❖ Activities that unfairly exploit women or men at any age;
- ❖ Activities that increase the vulnerability of subgroups or households or increase the overall inequality of communities
- ❖ International travel;
- ❖ Investments detrimental to the environment;
- ❖ Any activity on land that has disputed ownership or tenure rights;
- ❖ Any activity on land that has not been allocated in accordance with the procedures outlined in the ESMF;
- ❖ Cash donations;
- ❖ Vehicles (including tractors, threshers, trucks and buses but with water tankers as an exception);
- ❖ Enterprise development or income-generating activities
- ❖ Micro credit
- ❖ Any activity likely to increase social tensions and/or risk of violence beyond the given context
- ❖ Any other activity ruled out by the ESMF
- ❖ Any activity that introduces fish species that will in the end predominate in an ecological community, threatening the extinction of local fish species

Annex 2: Cultural and Chance Find Procedures

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

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

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

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

Annex 3: Voluntary Land Donation Guidelines and Consent Form

The Voluntary Land Donation Guidelines will be adjusted pending the final menu of projects and what kind of land requirements emerge. A limit of voluntary land donations will be included.

As individual land ownership and respective land titling is not widely established, the Project will consider any household using lands prior to disclosed activity commencement as having legitimate land use rights and such rights can be donated freely to the project according to the above provisions, if noted land is considered necessary for subproject implementation. Thus, in the following paragraphs “owner” refers to the owner of land-use-rights.

Voluntary land donations should only be authorized for activities if they can clearly document (a) the potential donor or donors have been appropriately informed and consulted about the project and the options available to them, (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation, (c) the amount of land being donated is minor and will not reduce the donor’s remaining land area below that required to maintain the donor’s livelihood at current levels, (d) no household relocation is involved, (e) the donor is expected to benefit directly from the project, and (f) for community or collective land, donation can only occur with the consent of individuals using of occupying the land. Procedures must be put into place to ensure that the donation is indeed voluntary, that the donor is the legitimate owner of land-use-rights on such lands, and that the donor is fully informed of the purpose of the donation and of the implications of donating the property. If the land is donated on a conditional basis, the terms and conditions for the temporary use of the property must be clearly documented. Land acquisitions on a “willing buyer/willing seller” basis should also be properly documented in order to ensure that fair compensation has been paid and to avoid future conflicts over land due to lack of transparency. These transactions are only valid if the seller was given a genuine opportunity to retain the land and refuse to sell it. If there are occupants of the land, other than the seller, they qualify for involuntary displacement when the seller sells the land (see RPF).

Voluntary land donation is strictly defined in international practice as the ceding of a property by an owner who is: a) fully informed; and b) can exercise free will, i.e., can refuse to sell or to donate. “Fully informed” means that the owner has complete information regarding the proposed activity and its impacts, its land requirements and its alternate activity sites, as well as his or her rights to compensation. The owner has also been provided with sufficient time to consider his or her disposition of the property, and the owner has knowingly rejected the right to renege on his or her initial decision. “Free will” means that the owner can reject the possibility of giving up his or her land, because: a) there are viable alternatives available (such as rerouting of a water main if an owner refuses access to his or property), or b) where no viable alternatives are available, the donation will be to his or her benefit (such as a road rehabilitation project that will also benefit the owner of a small piece of land to be donated for the road works).

The following basic provisions must be complied with:

- Land to be donated must be identified by the community through a participatory approach (this approach should include the Chiefs, however, Chiefs will not be able to decide alone on land donations)
- Impacts of proposed activities on donated land must be fully explained to the donor
- The potential donor is aware that refusal is an option, and that right of refusal is specified in the donation document the donor will sign

- The act of donation is undertaken without coercion, manipulation, or any form of pressure on the part of public or traditional authorities
- The donor may request monetary or non-monetary benefits or incentives as a condition for donation
- The proportion of land that may be donated cannot exceed the area required to maintain the donor's livelihood or that of his/her household
- Donation of land cannot occur if it requires any household relocation
- For community or collective land, donation can only occur with the consent of individuals using or occupying the land; land donations by communal authorities is not sufficient.
- Verification must be obtained from each person donating land (either through proper documentation or through confirmation by at least two witnesses)
- The implementing agency establishes that the land to be donated is free of encumbrances or encroachment and registers the donated land in an official land registry
- Any donated land that is not used for its agreed purpose is returned to the donor.

Each instance of voluntary land donation for an activity must be documented. This requires written notification indicating the location and amount of land that is sought and its intended use for the activity, and requires a formal statement of donation, establishing informed consent and signed by each owner or user involved. Taxes to be paid by the land donator for registration of the land transfer, if applicable, should be covered in full by the IP. The IP maintains a record with documentation for each instance of land donation. The documentation is made available for review in any grievance that may arise, and is provided to the World Bank upon request.

Land donations also will be subject to rigorous consultation strategies, as required under ESS 10, to ensure that people are fully informed and consulted on all project modalities and donate land in a fully informed way. Information dissemination and consultations will be conducted as defined in the SEP, and will ensure free, prior and informed consent (FPIC) from the affected groups.

The project must specify means by which land donors (and, potentially, persons whose use or occupancy was not recognized in the transfer of land) may raise grievances, and measures to ensure consideration of, and timely response to, grievances raised. Grievances may be referred to customary conflict mediation arrangements where they are not directly affiliated with traditional leaders who are a party to the donation process. Alternatively, grievances may be referred to grievance mechanisms established for project purposes. The grievance process imposes no cost upon those raising grievances, and participation in the grievance process does not preclude pursuit of legal remedies under the laws of Somalia.

It is possible to distinguish between “pure” donations without any compensation or support given to the person affected, vis-à-vis “partial” donations which involve some monetary or non-monetary benefits or incentives provided to the affected person. Both can be broadly classified as “voluntary donations” in the sense that the transfer of assets is done without involving the payment of compensation at replacement value. The Project will apply the “partial” donation approach for vulnerable households, to avoid that even small donations lead to livelihood impacts and provide additional support to ensure no impact of the land donation. Voluntary land donation may be allowed even if no viable alternative exists, as long as the donation is to the benefit of the donor (such as a road rehabilitation project that will also benefit the owner of a small piece of land to be donated for the road works); always conditional to the application of the above noted provisions.

All family members (including spouses) must be aware of the donation, in order to minimize the risks of women users of the land to be donated being passed over in decision-making on land donation and the risks of cross-generational conflicts. Individuals using or occupying community or collective lands must also be aware of the donation to minimize risks of settlers or migrants being passed over in decision-making on land donation (see five criteria above). The prior assessment of a sub-project shall also take into consideration temporary users of lands and/or eventual access issues for them, including to water sources and in such case ensure agreement on the activity with such groups (e.g. pastoralists). If there are occupants of the land, other than the seller, they qualify for involuntary displacement when the seller sells the land (see RPF).

The following agreement has been made on..... day of.....
between....., resident of(the
Use Right Owner or short Owner) and(the Recipient).

1. That the Owner holds the transferable right of the land/structure/other asset located at
2. That the Owner testifies that the land/structure is not subject to other claims.
3. That the Owner hereby grants to the Recipient this asset for the construction and development offor the benefit of the villagers and the public at large.
4. That the Owner will not claim any compensation against the grant of this asset.
5. That the Recipient agrees to accept this grant of asset for the purposes mentioned.
6. That the Recipient shall construct and develop theand take all possible precautions to avoid damage to adjacent land/structure/other assets.
7. That both parties agree that the.....so constructed/developed shall be public premises.
8. That the process and the outcome of this transaction is in line with the SCRP's Voluntary Land Donation Guideline as annexed to this agreement and made aware of to the Owner.
9. That the owner has been fully informed about all project modalities and provides free, prior and informed consent (FPIC).
10. That the provisions of this agreement will come into force from the date of signing of this deed.

Signature of the Owner

Signature of the Recipient

Witnesses:

1. _____

2. _____

(Signature, name and address)

Annex 4: GBV/SEA/SH and Child Protection Prevention and Response Action Plan

Crisis or natural disasters do not affect everyone equally. The Inter-Agency Standing Committee (IASC) acknowledges that women and girls are 'disproportionally exposed to loss of livelihoods, increased domestic responsibilities, and to Gender-Based Violence (GBV), as well as to threats to many aspects of their health and well-being' in conflict and disaster zones.¹⁵¹ Gender as well as other social, cultural, political or economic aspects can determine inequalities among individuals and social groups. These aspects can interact to determine the capacities, but also vulnerabilities of women, girls, men and boys. Furthermore, emergencies threaten health, safety and security of communities, especially for children. Abuse, neglect, exploitation and violence against children is likely to increase in such environments.

Emergency and post-emergency operations are implemented in a context of exacerbated risk for GBV, including challenges linked to sexual exploitation and abuse (SEA), sexual harassment and decreasing rights for children. Activities linked to humanitarian or development projects may compound the broader contextual risks present at community level. Project-induced risks relate to the size and scale of a project, the potential for labor influx, the geographic location of project activities, the ability (or inability) to supervise project activities, and the given emergency context. Income in the hands of workers can also create or worsen existing power imbalances between workers and weaker members of the community, in particular women and children. Identifying project-related risk factors as they interact with contextual risk factors and mitigating them is critical for the development of appropriate prevention measures for women, children and other vulnerable groups in project design.

This Action Plan details the operational measures to assess and mitigate the risks of gender-based violence, most notably sexual exploitation and abuse (SEA) and sexual harassment (SH), and how they will be integrated over the life of the project. This includes procedures for reporting, responding and managing grievances related to such abuse.

Contextual GBV Risks

GBV is widespread in Somalia, and considered to be a major obstacle to equality, peace and development in the country. Despite the lack of comprehensive and reliable national population based GBV prevalence data, information that does exist indicates that GBV is common in the lives of women and girls across the life course in Somalia, with some forms of GBV endemic. FGM/C has in the past been near universally practiced. Intimate partner violence and sexual violence, the most prevalent types of GBV globally, are both commonplace in the lives of Somali women and girls, although there is limited data on which to estimate reliable prevalence and trends in perpetration and victimization rates over time.

Some forms of GBV are normative in Somalia, including FGM/C, child marriage and some intimate partner violence behaviors, in particular a man's use of physical violence to discipline or control his wife under certain circumstances.¹⁵² Other normative forms of GBV in Somalia include cultural practices of

¹⁵¹ IASC, Policy. Gender Equality and the Empowerment of Women and Girls in Humanitarian Action, November 2017.

¹⁵² International Alert/CISP (2015) The Complexity of Sexual and Gender-Based Violence: Insights from Mogadishu and South Central Somalia, International Alert, Nairobi.

abduction and forced marriage and widow inheritance.¹⁵³ The extent to which each type of GBV is practiced and normative varies across regions of the country, and there are indications of apparent shifts in beliefs and attitudes that support FGM/C, child marriage and intimate partner violence within Somalia, as discussed in more detail in the next section. However, in the absence of reliable quantitative and qualitative research, it is hard to assess the degree of attitudinal change.

Conflicts, disasters and insecurity have in the past, and continue to, exacerbate risks associated with child marriage and intimate partner violence in Somalia. The effects that displacement has on increasing GBV risks and rates among internally displaced and refugee communities globally is increasingly recognized,¹⁵⁴ and evidence points to a similar escalation of violence against women catalysed by conflict and climate-related displacement and associated stressors in Somalia. Child marriage has been adopted as a past coping strategy for drought-affected families in response to acute economic insecurity,¹⁵⁵ and the altered economic and social dynamics resulting from displacement have been linked to increased intimate partner violence perpetration among displaced populations in Somalia.¹⁵⁶

As well as exacerbating child marriage and intimate partner violence, conflict and disaster-related displacement magnifies sexual violence risks for women and girls in Somalia. Women and girls are at amplified risk of sexual assault during movement to new areas and once settled in displaced settings. Unsafe environments, eroded protection mechanisms and social cohesion, and a lack of safe livelihoods options all increase the incidence of opportunistic sexual violence perpetrated in and around displaced settings when women and girls are collecting water, firewood and other resources, and when in public spaces and accessing public facilities.¹⁵⁷

Sexual exploitation and abuse of children and women by people in positions of authority and power are reportedly common in Somalia, and as elsewhere, linked to poverty, insecurity and impunity.¹⁵⁸ Although the issue remains under-researched due to the significant sensitivities associated with it, there is evidence of high levels of sexual exploitation and abuse by domestic and foreign security forces and by civilians.¹⁵⁹ Anecdotal evidence from humanitarian and development agencies indicate that sexual exploitation and abuse is a largely unreported and significant problem in the country.

Conflict in Somalia has given rise new expressions of GBV in recent decades, in particular conflict-related sexual violence (CRSV), with both state and non-state actors implicated in perpetration. Sexual violence has been deployed as a conflict strategy by armed actors to punish, humiliate and displace

¹⁵³Norwegian Country of Origin Information Centre (2018) Somalia: Marriage and divorce, Landinfo, Oslo.

¹⁵⁴Vu, A. et al, 'The prevalence of sexual violence among female refugees in complex humanitarian emergencies: a systematic review and metaanalysis', in PLOS Currents Disasters: Stark, L and Ager (2011) 'A systematic review of prevalence studies of gender-based violence in complex emergencies', in Trauma Violence Abuse 2011;12:127–34.

¹⁵⁵ Ministry of Planning, Investment and Economic Development Somalia Drought Impact & Needs Assessment, Federal Government of Somalia, Mogadishu, 2017; Girls Not Brides, Child Marriage in Humanitarian Settings, Girls Not Brides, London, 2018; Myers, J., Untying the Knot: Exploring Child Marriage in Fragile Settings, World Vision UK, 2013, London.

¹⁵⁶ Oxfam Rapid Gender Analysis for Oxfam Drought Response in Somaliland, Oxfam, June 2017.

¹⁵⁷Ministry of Planning, Investment and Economic Development, 2017; Refugees International *On the Edge of Disaster: Somalis forced to flee drought and near famine conditions*, RI, Washington DC, 2017; Human Rights Watch *Here, Rape is Normal*, HRW, 2014a, New York.

¹⁵⁸ See Reports of the United Nations Secretary-General on Sexual Violence in Conflict S/2019/280 and 2018/250; Human Right Watch "The Power These Men Have Over Us" *Sexual Exploitation and Abuse by African Union Forces in Somalia*, HRW, 2014b, New York.

¹⁵⁹Human Rights Watch 2014.

populations, and through forced marriages based on family, clan or political affiliation, to control women's fertility and reproductive capacities. Women and girls have also been exposed to sexual violence indirectly linked to conflict, opportunistically sexually assaulted by authorities, smugglers and traffickers, with displaced women and girls used as 'payment' for safe passage at checkpoints.¹⁶⁰ The surge in sexual assault since the onset of civil war in 1991-92 has been described as 'shocking' for Somali culture.¹⁶¹ On a positive note, the recent post-conflict period has seen a reduction in the incidence of conflict-related rape and sexual assault in Mogadishu following the withdrawal of clan militias.¹⁶²

Sexual violence, along with other violence, is normalized in Somalia. This apparent normalization appears to be the result of sustained exposure to elevated levels of sexual violence over past decades compounded by the lack of national and community-level communication, discussion and dialogue about sexual violence and other forms of GBV.¹⁶³ This combination of high levels of exposure and low levels of public and private discourse have created an environment which not only enables violence against women and girls to continue, but also curbs national and community-level awareness, commitment and action to do something about it.

The impacts of GBV are long-lasting and severe, resulting not only in physical and mental health problems that can last a lifetime for the individuals experiencing it, but it also creates a considerable economic burden for households, communities and countries.¹⁶⁴ GBV can affect women's contribution to household income, result in high costs for social services required by survivors, affect children's development prospects and therefore negatively affect a country's economic growth as well as feed the intergenerational transmission of violence, as experiencing one type of violence may increase the likelihood of perpetrating or becoming a survivor of another type of violence later in life.

There is recognition as well that humanitarian and development operations have the potential to increase or introduce new risks of GBV, including the risks of sexual exploitation and abuse (SEA) and sexual harassment (SH). These risks can manifest in different ways by a range of perpetrators linked to the implementation of operations both in the public and private spheres, for example, through the large influx of workers, which may increase risk of transactional sex, change power dynamics at home, contribute to redistribution of land where women are typically excluded from land titles, or the lack of safe ways of facilitating access to work for women.

Identifying and understanding both project-related and existing contextual risks linked to GBV and particularly sexual harassment, exploitation and abuse is important to ensure that Bank-supported projects do not contribute to or exacerbate existing dynamics or vulnerabilities perpetuating violence. This should be accompanied by decisive action to develop appropriate prevention and mitigation measures integrated into project design and to be monitored throughout project implementation. Key measures, in particular response to allegations, should be survivor-centered (ensuring survivors' confidentiality and rights to informed choices) and should focus on protection and prevention of GBV, SEA and child protection risks. Protection and prevention efforts should be based on active participation of affected groups in the design and implementation of actions to ensure that activities are fully informed.

¹⁶⁰ Musse 2004.

¹⁶¹ Ritchie, H. and Koshin, S. A., *Country Gender Profile Somalia: Trends of Change in a Fragile and Fragmented Context?*, African Development Bank and UN Women, 2019, Nairobi.

¹⁶² International Alert/CISP 2015.

¹⁶³ International Alert/CISP 2015.

¹⁶⁴ (World Bank Group, 2014)

Classification of GBV/SEA

GBV: Gender-based violence refers to, ‘ an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially ascribed gender differences.’¹⁶⁵ It can thereby occur in a variety of different ways, including through the infliction of physical, mental, and sexual harm or suffering’ threats of such acts, as well as coercion and other deprivations of liberty, such as early or forced marriage, economic abuse and denial of resources, services and opportunities, trafficking and abduction for exploitation, Intimate Partner Violence (IPV) perpetrated by a former or current partner.

While GBV manifests in multiple types of violence, project-related risks of GBV are most likely to include:

1. **Sexual exploitation and abuse**¹⁶⁶ (SEA): SEA refers primarily to
 - **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.¹⁶⁷
 - **Sexual abuse:** actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg.
2. **Workplace sexual harassment** –any unwanted sexual advances; requests for sexual favors, sexual physical contact
3. **Violence against Children:** The Convention on the Rights of the Child defines violence against children as: ‘all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse...’. Child labor, however, is treated by UNICEF as a context of heightened risk of violence rather than violence itself.¹⁶⁸

While project-related risks are anticipated to manifest in these specific forms of GBV, other types of violations may emerge, including for example as related to human trafficking, —sexual slavery, coerced transactional sex, illegal transnational people movement—and other non-SEA forms of GBV such as physical assault, psychological or physical abuse, denial of resources opportunities or services, IPV.¹⁶⁹

Potential Project-related SEA/SH Risks

As indicated, development projects have the potential to create or exacerbate risks of varying forms of GBV, including SEA and SH. Furthermore, development operations can cause shifts in communal power dynamics between community members and within households, which can lead to male jealousy within homes and to domestic violence. Land redistribution can make women vulnerable to GBV, as they may lose their livelihoods.¹⁷⁰ Key risks that may emerge as a result of the project include:

¹⁶⁵2015 Inter-Agency Standing Committee Gender-based Violence Guidelines, p. 5.

¹⁶⁶ United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners, accessed at: https://www.un.org/preventing-sexual-exploitation-and-abuse/sites/www.un.org.preventing-sexual-exploitation-and-abuse/files/un_protocol_on_sea_allegations_involving_implementing_partners_en.pdf

¹⁶⁷UN Glossary on Sexual Exploitation and Abuse 2017, p. 6.

¹⁶⁸ UNICEF, Preventing and Responding to Violence against Children and Adolescents. Theory of Change 2017.

¹⁶⁹World Bank 2018, p. 3.

¹⁷⁰World Bank, 2018, p.1.

- **Abuse of power and discrimination in priority-setting and community engagement processes:** Women, girls and other groups that have less power and status such as people with disabilities, unmarried women/girls, women and girls associated with armed groups/forces, displaced/returning individuals and families and minority ethnic/clan groups are more likely to be invisible or hidden in community consultation and engagement processes. Additionally, patriarchal norms in Somali society often lead women and girls – of all groups – to be left out of community discussions or to have their needs and priorities silenced. This exclusion from spaces of voice, agency and decision-making can lead to decisions that further harm or marginalize them.
- **Patriarchal norms that lead to specific, normative, designs based on male, able-bodied models and priorities in traditional master plans:** In urban design and planning projects – including road construction – and/or adherence to current neighborhood plans – women and girls’ exclusion from planning and design spaces can result in permanent designs and urban infrastructure that either ignores, or exacerbates, women and girls’ risks of GBV/SEAH in the city and/or when accessing urban services. For example, primary roads located too close to areas where women and girls need to go for services, including in the evening. Secondary roads important for women and girls’ use (for example, to access/fetch local water resources or markets) but that are poorly lit, or overly isolated from sufficient protective foot traffic.
- **Abuse of power, including sexual exploitation and abuse and bullying, in hiring, employment, and retention practices:** Hiring and employment practices that seek to increase the number of women in different employment positions – from skilled labour in Ministries and within contractors (ie engineers) to community engagement officers – can expose women to incidents of sexual exploitation (pressure to perform sexual acts in exchange for work), harassment, or violence; for example when moving about communities and/or engaging with male leaders and/or community members. Additionally, unequal gender norms and harmful beliefs (such as the idea that a woman moving about on her own might not have clan protection and is a legitimate target for abuse, harassment, violence, etc) run the risk of creating hostile environments for female staff members at both the skilled and unskilled levels. In those situations where female staff – skilled and unskilled – have less time available for traditional gender role related duties in the household such as child care, there is also a risk of increased IPV as household members push back.
- **Abuse of power, including sexual exploitation and abuse, in dissemination of accurate information on available services and avenues for grievance redress:** Misinformation or lack of information throughout the components of the project can lead to harm and violence towards different strata of communities, especially those with less agency and power. For example, community engagement officers may charge families a nominal fee to participate in engagement processes for their own economic benefit when the engagement process is designed to be free. Information and education dissemination activities must engage and reach out to all within society; corresponding monitoring and safeguards, such as grievance redress mechanisms can mitigate some of this risk.
- **Community conflict resolution approaches can lead to more harm, including against survivors who report GBV/SEAH experiences:** Community or local governance resolution processes might reinforce gender inequality pushing for resolutions that widen inequalities, are not survivor-centered and may lead to impunity and more harm to a survivor (through marriage to a perpetrator, re-victimization or other consequences). Existing sociocultural dynamics that

maintain male-dominance household decision-making, policies and laws that discriminate against women, cultural norms that condone violence as a form of conflict resolution or discipline and the wide acceptance of GBV among both male and female Somalis – including Somali staff and volunteers – and the stigma of experiencing GBV make it difficult to share those experiences attitudes of tolerance to violence against women and girls¹⁷¹.

- **Project size and scope limit opportunities for supervision and protection services:** The SCRP is large in scale and size and will intersect with a variety of rural communities, potentially in areas with minimal opportunities for supervision and with limited protection services, which all contributes to increasing risk of GBV/SEA. Also, it is likely that small rural communities will have limited access to protection services. This same labor influx can exacerbate power imbalances via increase in income of foreign workers coupled with lack of sanctions from inappropriate worker behavior. At the family and individual level, the project can create power imbalances at the household level by working only with men or women. At the individual level the project can create grievances; and it is responsible for distributing information on how to report them.

In sum, the potential adverse risks and impacts in the implementation of the SCRP project include GBV/SEA/SH. The World Bank's GBV risks rating for the SCRP project has been classified as **High**.

Key Mitigation Measures to Address GB/SEA/SH Risks

Risks of GBV/SEA are to a certain extent mitigated by the presence of existing services and management in the country. Existing GBV/SEA/SH managing systems in Somalia include the Somalia Protection Cluster as well as GBV/SEA/SH multi-sectoral service providers.

The Protection Cluster in Somalia, as the umbrella organization on GBV in the country, addresses the widespread, multi-faceted nature of protection concerns in Somalia. Under the Protection Cluster, the Gender-Based Violence (GBV) Sub Cluster aims to provide comprehensive GBV services, including GBV case management, psychosocial support and referral mechanisms for survivors, among others. Through the Child protection sub cluster provides immediate care to child survivors of violence, among others. The Protection Cluster responded to floods in worst-hit areas in Hirshabelle, Jubaland, and South West States by establishing 4 safe spaces for women, girls and youth, 7 mobile clinics, 11 functional health facilities that provide Emergency Obstetric Care and 6 health facilities that incorporate one-stop centers for GBV survivors. A total of 1863 GBV survivors reached these services. Data available from 2019 shows the number of GBV survivors receiving clinical care, case management, psychosocial support, legal assistance, and safe house support per targeted project areas¹⁷² under the efforts of the protection cluster and its partners. In total, approximately 72.800 GBV survivors reached GBV services.

Somalia GBV Service Providers. The actors working on GBV service provision and referral pathways in SCRP project areas are described in ANNEX 1 of this Action Plan. To date, the type and quality of key services, including Case management, Clinical Management of Rape (CRM), Psycho-social support, Livelihoods, Safety and legal and justice can vary significantly from one location to another.

¹⁷¹World Bank2020, p.28

¹⁷² OCHA, Humanitarian InSight Somalia 2019, Humanitarian Response Plan 1.1.

Key components of the GBV/SEAH and Child Protection Action Plan

Where relevant, the Action Plan will build on available and planned mechanisms, as they are grounded in the organizations' experience in country or in their respective sectors. This allows for the most efficient use of available systems, avoiding duplication in initiatives.

In addition to building on existing GBV prevention and response systems operating on the ground, SCRP will implement additional GBV/SEA/H risk mitigation measures in alignment with requirements articulated within the WB Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment. These measures include:

- Hiring of a GBV/SEA/H Specialist by the PIU to ensure effective implementation of GBV/SEA/H risk management requirements;
- Development, training on and signing by all project workers of explicit Code of Conduct outlining expectations for behavior related to GBV/SEA/H, including prohibition of sexual activity with anyone under the age of 18 regardless of national laws, as well as sanctions for potential breach of the Code;
- Ensuring that contractors have the capacity to manage SEA/SH Risks, to be articulated in bidding documents and evaluated during the selection process;
- SEA awareness and sensitization training for all project workers at all levels, as well as for communities to inform them of potential project risks and reporting and response options;
- Identification of relevant organizations and community actors to provide information and support for GBV-related initiatives;
- Ensuring funding for the recruitment and contracting of quality GBV services Providers in project-affected areas to facilitate access to timely, safe and confidential services for survivors;
- Development of procedures and protocols to enable provision of services for survivors that are timely, confidential and survivor-centered and protect survivors from stigma and retaliation;
- Establishing clear internal reporting and redress protocols for management of GBV/SEAH cases;
-
- Ensuring that the project-level Grievance Redress Mechanism (GRM) includes measures to enable reporting of GBV/SEAH complaints. The GRM should have multiple access options, trained staff and a specific protocol handling SEA/SH complaint so the right action is triggered;
- Monitoring risk of GBV/SEA/H risks and mitigation measures continuously throughout the life of a project; and
- Hiring of a Third-Party Monitor to track implementation of the GBV/SEA Action Plan

This GBV Action Plan has been developed to accompany the implementation of the SCRP to ensure that the Project does not create or exacerbate risks of GBV, SEA/SH or the abuse of children. It presents operational activities as well as recommendations for GBV, SEA and SH risk mitigation measures that build on existing mechanisms in project-affected areas in Somalia. The Action Plan provides a roadmap for the general procedures for mitigating and responding to GBV/SEA/SH in the project sites that will be expanded upon and operationalized as the project planning and design evolves and the PIU GBV specialist is hired. These measures will further be integrated into the Project Operations Manual and updated as needed throughout the life of the project. GBV/SEA/SH response measures are designed based on World Bank

recommendations for improving gender outcomes,¹⁷³ review of lessons learned from different actors working in Somalia and consultation with GBV/SEA/SH experts regarding the empowerment and protection of children, women and youth populations.

The GBV/SEA/SH Action Plan is organized around the following key actions:

Strengthen institutional capacity for GBV/SEA risk mitigation and response

- **Strengthen co-ordination and collaboration** at national and sub-national levels on the GBV response by involving the relevant Government units such as the Ministry of Women and Human Rights Development (MoWHRD) and the Ministry of Planning, Investment and Economic Development (MoPIED), in the strengthening of the GBV package of services and referral system in project areas. To this end, the project will strengthen the reporting mechanism and procedures of local systems to ensure a survivor centred referral and response.
- **Hire a GBV/SEA specialist in the PIU** to supervise and provide technical support for the implementation of GBV/SEA Action Plan. See below for TOR consultancy services for a GBV/SEA Specialist in the PIU.

GBV/SEA/SH requirements for project partners and IPs

- Where feasible, partner institutions should build on existing GBV/SEA/SH risk management systems. For example, UNOPS and partner organizations have Prevention of Sexual Exploitation and Abuse (PSEA) mechanisms and PSEA **misconduct response systems** in place within their respective organizations, which will apply under the SCRP implementation, and which will ensure organizational responses for misconduct of UN staff or any worker of IPs and sub-contractors of the SCRP. These responses will follow the different organizational set-ups, but will all comply with the relevant UN and WB protocols on management of SEA/SH risks. Should a partner not have sufficient measures in place, they will have to develop appropriate standards and methods to address any gaps. Responses will include the implementation of sanctions for violations of worker CoCs.
- All IPs should have **organizational whistleblowing policies** that encourage staff to report concerns or suspicions of misconduct by colleagues by offering protection from retaliation for reporting. The definition, scope, and protection measures may differ between organizations. General principles¹⁷⁴ apply to whistle-blowers, as they would to any complainant, and internal agency policies shall protect whistle-blowers on SEA from retaliation, so long as the report is made in good faith and in compliance with internal agency policies.

¹⁷³ World Bank's Good Practice Note: Addressing SEA/SH in IPF with Major Civil Works, the Secretary-General's Bulletin ST/SGB/2003/13, dated 9 October 2003, on "Special measures for protection from sexual exploitation and sexual abuse", as well as the Secretary-General's Report A/71/818 dated 28 February 2017 on "Special measures for protection from sexual exploitation and abuse: a new approach".¹⁷³ GBV/SEA/SH Action plan activities are:

¹⁷⁴ GBV programming guiding principles. **Confidentiality:** At all stages of an intervention, the privacy and confidentiality of survivors will be ensured, prioritizing the well-being of survivors and that the delivery of services and support will not compromise the privacy or identity of individuals involved. **Respect:** Respecting the wishes, dignity and choice of the survivors will be observed at all times and during all stages of any intervention. Survivors will be supported to give their free and informed consent, based on a clear understanding of the facts, implications, risks and consequences of an action, before information is shared or action is taken. **Safety and security:** Awareness and consideration of any risks or safety concerns that might compromise the physical safety of individuals affected by GBV will be sufficiently addressed and factored into any GBV intervention or initiative. **Non-discrimination:** All GBV interventions will be designed to ensure access and the same level of quality of care and assistance for all persons seeking support, or persons affected by GBV, without regard to sex, sexual orientation, gender identity, age, ethnicity, religion or other status.

Establishment of GBV/SEA/SH channels and procedures for the Grievance Redress Mechanism (GRM)
The SCRP will have a GRM that handles complaints and feedback from all stakeholders involved in the project. Cases of GBV/SEA/SH can be reported through the main channels of the general Project GRM. However, given the sensitive nature of issues related to GBV, the GRM will include multiple channels to enable safe, confidential reporting of GBV-related complaints, particularly as linked to SEA/SH. Such channels may include identification of community focal points and SEA/AH focal points, relevant local partner organizations, phone, and/or email. Pending informed consent from survivors, complaints received through such mechanisms will be channeled into the main GRM systems. SH channels and procedures for reporting through the workers GRM will be developed and SH reports will be handled through project worker GRM.

The GRM should consider inclusion of key features on enabling reporting of GBV cases: 1) Establish quotas for women in community level grievance management to facilitate women to women reporting, 2) provide multiple channels to receive complaints). IT-based solutions such as web-based Grievance registration systems and hotlines). 4) Communicate GRM services at the community level to create GBV awareness and enable project-affected people to file complaints. All information will be made accessible to children. The GRM Operators will be trained on key protocols including referral, reporting and informed consent protocols to receive those cases in an appropriate manner and immediately forward it to the GBV/SEA referral system.

Communication to project affected communities about GBV/SEA/SH risks and mechanisms:

- **Community awareness on GBV/SEA/SH.** Education and raising of awareness for women, adolescents and children of SEA and their legal rights will be provided. Project beneficiaries should be made aware of the laws and services that can protect them and provide redress in case of an incident. The project will create any necessary IEC materials with the help of the GBV specialist and supervision of WB and UNOPS. CoCs will be made available to the public in the project areas, especially to identified project stakeholders, to raise awareness of expected behavior of any project-related worker and mechanisms for reporting should those workers be in breach of the CoC.
- **Gender and child-sensitive communication channels:** Disclosure will take place through multiple communication channels to be identified, taking in considerations women's safety when designing and distributing information by the PIU and/or the respective IP. For instance, information on cards, pamphlets and or posters will be distributed in places like bathrooms, where women can look at them without being observed by a male partner.¹⁷⁵ Also, construction sites and waste management sites, which attract children playing in the community, should be used for information dissemination.

Sensitization and capacity building of PIU, GRM, Workers, Service Providers and Partners on SEA/SH in the project:

- **Adoption of the Core Principles of the IASC Task Force and World Bank Action Plan on PSEA¹⁷⁶.** All categories of workers will be induced and will sign a Code of Conduct (CoC), which includes expected standards of behavior regarding GBV/SEA according to the World Bank's 2017 Standard Procurement

¹⁷⁵World Bank 2019

¹⁷⁶ IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at: <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>

Documents (SPDs)¹⁷⁷. IPs will further ensure that all contractors, suppliers, NGOs and other implementing partners' workers have been induced and have signed a CoC.

- **Sensitization and training all project-related staff on expectations around SEA/SH.** PIU and IPs will ensure that their direct workers, partners, sub-contractors, suppliers and those appointed as SEA focal points are **trained in CoCs and GBV/SEA** and child protection risk issues as part of their induction as well as throughout course of employment. All categories of workers will be induced and will sign a Code of Conduct (CoC), which includes expected standards of behaviour regarding GBV/SEA according to the World Bank's 2017 Standard Procurement Documents (SPDs)¹⁷⁸. IPs will further ensure that all contractors, suppliers, NGOs and other implementing partners' workers have been induced and have signed a CoC PSEA¹⁷⁹. PIU and IPs will roll out direct training activities for all contracted as well as community workers deployed for their activities – prior to the start of such. The IPs ensure that records of all inductions are kept and shared with the PIU. At a minimum training should include explanation of GBV/SEAH, expectations for behavior and conduct, sanctions for violations, roles and responsibilities of actors involved, GBV incident report mechanism, accountability and referral procedures.
- The PIU, and in particular the GBV specialist with supervision of the World Bank, will review training and communications materials, make suggestions if there are gaps and assess the need of follow-up activities. UNOPS and the IPs will pass on all relevant details to their respective field staff, and will take up the information in their various trainings and community awareness activities. The SCRP project, as part of the project's health component, will build capacity of health staff on addressing and dealing with GBV survivors, including on minimum standards for clinical management of rape and case management.

Conduct GBV risks assessments at project sites:

GBV risk assessments will be done using the safety audits methodology. Safety audits are particularly important to improve safety in the project sites, monitor and promote equal and meaningful access to resources, services and facilities and ensure that do not harm principle is respected. The GBV specialist together with WB and UNOPS will adapt existing safety audits tools for use under the project. Results of the safety audits will be incorporated in all project sub components involving construction activities, cash for work activities as well as women participation in employment opportunities. Examples of these activities would be adequate lighting, flexible work-schedules and provision of adequate hygiene and sanitation services in project sites. A key activity under the project will be to adapt/develop the safety audit tool to the project specific context.

Strengthening GBV services providers and referral pathways

- **Assessment of capacity of GBV service providers in project sites:** A GBV specialist, with the logistical support of the PIU and potentially in partnership with IPs, will assess the capacity and quality of GBV/SEA service providers in project areas with the objective of establishing effective referral pathways for survivors. The GBV specialist will develop or adapt tools, (WHO and JHPEIGO) to be

¹⁷⁷ The World Bank has not “endorsed” a template CoC for projects. The SPDs provide guidance on the minimum content of issues to be addressed in the CoC.

¹⁷⁸ The World Bank has not “endorsed” a template CoC for projects. The SPDs provide guidance on the minimum content of issues to be addressed in the CoC.

¹⁷⁹ IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at: <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>

reviewed and approved by the WB/UNOPS, for assessing capacity of GBV service providers in SCRP project areas and produce an assessment report that will serve as baseline data on service providers. The GBV specialist, with support from WB and UNOPS specialists and other relevant organizations particularly within the GBV sub-cluster, will further delineate the project –related referral pathways and protocols based on available information on GBV referral services in project areas. The objective is to enable provision of quality response services for survivors (e.g. case management, medical, legal and psychosocial support) in project areas.

- Classification of existing Service Providers according to their technical capacity on GBV (according to global standards) to update existing referral pathways.
- Development of referral protocols and procedures (e.g. informed consent protocols) to enable access to services for survivors.
- Identification and contracting of GBV Service Providers to facilitate access to timely, safe and confidential services for survivors.

Establishment of a Reporting Protocol

A strong SEA/SH reporting Protocol will ensure timely and safe reporting of SEA/SH incidences. Beneficiaries and communities should be informed of the availability of varying channels of reporting for allegations related to GBV/SEA. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information.

Appointment of GBV/SEA Focal points at community and project level. PIU and IPs will ensure that an SEA focal point is designated in all project areas in the field as well as at the country level. The SEA Focal points will be the designated person to handle GBV complaints. They will have specific responsibilities and will be trained on GBV/SEA/SH mechanisms. The PIU GBV specialist will identify specific responsibilities and train on SEA Focal Points GBV/SEA/SH mechanisms.

Cases of GBV/SEA can be reported through the Project GRM, SEA focal points, as well as through identified GBV service providers. The GRM, SEA focal points and GBV service providers will ensure appropriate response by 1) providing a safe, non-judgmental and caring environment and respect the confidentiality and wishes of the survivor; 2) provide reliable and comprehensive information on the available services and support to survivors of GBV; 3) If survivor agrees, obtain informed consent and make referrals.

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 24 hours following informed agreement by the survivor. The PIU will follow procedures and requirements for reporting complaints through the ESIRT¹⁸⁰.

If such cases are reported through the SEA Focal points in project-affected communities, focal points will register cases in the GRM, ensuring confidentiality, and will report to the PIU and WB within 24 hours pending informed consent by the survivor. Additionally, the focal point will inform the survivor about referral pathways and available GBV support services.

If such cases are reported through GBV service providers, service providers will inform project SEA focal points of the incident (following confidentiality standards) who will register the case in the GRM, and the

¹⁸⁰ Reporting tool meant to be used for reporting project-related complaints

service provider in conjunction with the SEA focal point, refer the survivor to any additional services as needed/requested by the survivor.

Cases of SH should be reported through the established worker GRM if incident concerns a direct worker or a worker from a sub-contractor, NGO partner or even a community worker. Response options should similarly follow a survivor-centered approach. The IP or contracted workers may have in place procedures and processes for managing cases that should be articulated in bidding documents and should be reviewed during selection evaluation under this project. If deemed appropriate, those existing systems will be used; if there are gaps, they will be addressed under the project.

- a) Staff who receive and/or report allegations who are not a designated SEA focal point must:
 - Upon consent of the affected person, inform a designated SEA Focal Point or GRM operator as soon as possible.
 - Provide accurate information about where to receive assistance e.g. medical/clinical, legal, psychosocial support (address, phone number).
 - Maintain confidentiality of all reported allegations, including the identity of complainant/s and subject/s.
 - If requested, the staff that received the complaint can act as a liaison between the complainant (including his/her family) and those persons conducting any subsequent investigation, ensuring at all stages that the safety, health and legal needs of the complainant are taken into consideration and that he or she is not subject to intimidation as a result of lodging the complaint.
- b) **If the complaint implicates a staff member of a different organization** such as the IP, a copy of the incident report will be forwarded to the SEA Focal Point in the organization subject to an allegation, and the World Bank. The PIU will discuss and agree with the Focal Point on the responsibilities for follow up on the safety, security, health and legal needs.
- c) **If the complaint is a rumor or the alleged perpetrator (s) affliction is unknown**, a copy of the incident report will be forwarded to the PIU and the World Bank. The PIU will call for a meeting of the SEA focal points of the organizations involved to develop a strategy for assessing the veracity of the rumors or allegations. If an investigation is deemed to be warranted and UNOPS or IPs personnel are suspected to be involved, the PIU will inform the referring Focal Point and refer the matter to UNOPS/IPs HQs. The PIU will further report to the World Bank within 24 hours.
- d) **In case the survivor is a child**, the consent of parents or guardians should be sought where it is in the best interest of the child and if they are not the perpetrators. All service provider interventions to child survivors must be undertaken with staff trained in child-friendly procedures in regards to the handling of cases. A child survivor should continue to go to school while procedures are on-going and all efforts should be done to ensure her/his protection. In addition to this, all the above reporting and referral procedures should be applied. In this context, a child perpetrator is a boy or girl under 18 years of age who has allegedly committed an act of GBV against another person. In regards to child perpetrators, juvenile justice procedures apply. Child perpetrators should undergo rehabilitation and psycho-social counselling.

The following procedure will be undertaken using an established standardized report:

- Fill up the Incident Notification Form (Annex II)

- Provide accurate information about where to receive assistance e.g. medical/clinical, legal, psychosocial support (address, phone number).
- Establishing the appropriate procedure including the need for medical examination of the victim and the perpetrator
- Producing a comprehensive report to enable duty bearers assess and take appropriate actions
- Follow up of GBV Cases and victims to ensure appropriate services are accessed by the survivor

SEA/SH Referral Pathway

The GBV/SEA referral system will guarantee that survivors receive all necessary services they may choose, including medical, legal, counseling, and that cases are reported to the police with informed consent of the survivor. A standardized Incident Notification Form will be used to register GBV/SEA/SH incidents (See Annex II)

A survivor has the right to make informed choice of services. GRM, SEA Focal points and service providers should be able to provide comprehensive information about existing referral pathways. When the survivor is referred, explanation on services available and which conditions apply should be thorough. For instance, there is a 72 hours' time limit for (Post –Exposure Prophylaxis (PEP) in case of a sexual abuse survivor.

Prioritized response actions for GBV survivors are:

1. Medical examination and treatment of the survivor
2. Early psychosocial counselling to avoid or reduce traumatic feeling for the GBV survivor
3. Police investigation and protection intervention for physical safety Social re-integration where deemed necessary and with consent of the survivor
4. Access to Justice
5. Place of safety/shelter

Accountability Framework

- **Development of an Accountability Framework:** The GBV Specialist will work with WB and UNOPS to develop an Accountability Framework, which will articulate which parties are responsible to verification/investigate/overall management of cases within government/IP should they occur.
- The GRM Operators and GBV service providers, in coordination with SEA focal points, will be trained to receive GBV/SEA/SH cases in an appropriate manner and specific responsibilities in handling, verify and investigate, GBV complaints will be identified prior to receiving complaints.
- GBV/SEA/SH handling of cases within PIU and IPs will follow the different organizational set-ups, but will all comply with the relevant UN and WB protocols on management of SEA/SH risks. Responses will include the implementation of sanctions for violations of worker CoCs. The GBV specialist will review PIU and IPs protocols to make sure they comply with the project standards. SH cases reports will be handled through project worker GRM.
- All implementers of the SCRP commit to **timely and expeditious action** to provide assistance to survivors, to prevent, respond and to comply with all timelines for action laid out in the Action Plan. Verification and investigation processes should ensure confidentiality of the survivor, a survivor-centred approach and a speedy resolution in accordance to the GBV/SEA/SH Action Plan referral

protocol for referring and addressing complaints (see process for referring and addressing complaints).

- If requested, IP staff, SEA Focal points, GRM staff and GBV service providers that received the complaint can act as a liaison between the complainant (including his/her family) and those persons conducting any subsequent investigation, ensuring at all stages that the safety, health and legal needs of the complainant are taken into consideration and that he or she is not subject to intimidation as a result of lodging the complaint.
- **Sanctions:** Any acts of SEA/SH, including any sexual activity with anyone under the age of 18, constitute serious misconduct and is grounds for disciplinary measures, including summary dismissal for PIU, UNOPS IP staff and referral to enforcement authorities for criminal prosecution where appropriate. For implementing partners and contractors, any failure to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof or to take corrective action, constitutes grounds for termination of the Agreement or Contract with PIU. The designated SEA Focal point should notify the GRM and WB of the closure of the case. Specific sanctions as per type of violation will be developed by the GBV specialist.

Monitoring and Supervision Action Plan

Third Party Monitoring (TPM) and Supervision of GBV/SEA/SH Plan

The PIU will contract TPM for the GBV/SEA/SH Action Plan that will ensure that implementation of GBV/SEA/SH project requirements are being implemented. The IVAs will adopt a mixed-method approach to monitoring, including the utilization of perception surveys and community-based monitoring if relevant, to enable an in-depth understanding of the impact of activities on community members. This is a particularly pertinent approach given the sensitivities of interventions.

Quarterly monitoring of Action Plan. The IVA will monitor the implementation of this Action Plan on a quarterly basis. Quarterly reviews will focus on:

- Ensuring that all activities (as listed above) have been undertaken and/or are on track
- Reviewing case log of reported complaints
- Monitoring and reporting on the effectiveness of the implementation of the GBV/SEA/SH Action Plan.
- Reporting on progress on all activities and re-assessment of risks, monitoring of the situation as appropriate.

Non-compliance: Where quarterly reviews identify non-compliance with the GBV/SEA/SH Action Plan, the matter will be reported to the PIU Project Manager, GBV specialist and WB in case of IPs or other project partners non-compliance. The PIU and WB will then seek clarification from the respective IP or PIU and jointly develop plans how to assist to bring activities back on track. Serious cases can lead to the termination of contract with the IP.

SEA Focal points will monitor that:

- Communities, including children, are aware of the risks of GBV, their rights and the mechanisms available to them to report GBV cases;

- Referral pathways in place and functional;
- Appropriate GBV services and referral pathways are provided to survivors and accountability processes are followed;

IPs will monitor that:

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 will be monitored and reported to the PIU and the World Bank.

Available GBV service providers in project areas¹⁸¹:

Below is a list of the actors working on GBV service provision and referral pathways in SCRP project areas. To date, the type and quality of key services, including Case management, Clinical Management of Rape (CRM), Psycho-social support, Livelihoods, Safety and legal and justice can vary significantly from one location to another. Therefore, this list is subject to further refinement during implementation in consultation with actors in the GBV sub-cluster to ensure referrals are made to the highest quality service providers in available areas.

State	Region	District	Organization	Services Available	Village, town or IDP Settlements	Name and contact of focal person (email address and telephone)
Hirshabelle	Hiraan	Beletwe yne	HIWDO Family Care (Hiran Women Development Organization)	Medical assistance	Haweyo	Dahir Dhi'isow Tel. 0615109151; E-mail: hwdfamilycare@gmail.com
Hirshabelle	Hiraan	Beletwe yne	Salama Hospital	Medical assistance	Beletweyne	Awale Abdi Farah, Tel. 0616666605; E-mail cawaale500@gmail.com
Hirshabelle	Hiraan	Beletwe yne	Rajo Relief and Development Organization	Medical assistance	Beletweyne	Farah Hassan Mohamed Tel. 0615536247 E-mail: rrdo99@gmail.com
Hirshabelle	Hiraan	Beletwe yne	Doyale Relief and Development Organization	Medical assistance	Beletweyne	Mohamed Abukar, Tel. 0615597789, E-mail: Doyaley@yahoo.com Ahmed Dhubow Abdi, Tel. 0615571506, Email: Doyaley@yahoo.com
Hirshabelle	Hiraan	Beletwe yne	HIWA (Humanitarian Integrity for Women Action)	Medical assistance	Beletweyne	Aliya Adan Abdi, Tel. 0615209999 E-mail: Hiwa.Hiran@gmail.com
Hirshabelle	Hiraan	Beletwe yne	WARDI	Medical assistance	Beletweyne	GBV/CP Head of the officer Hussein Abdi Issak, Tel.0615501688, E-mail: wardi.hiran@hotmail.com;

¹⁸¹ WFP-WB, 2020.

Hirshabelle	Middle Shabelle	Balcad	SHARDO	Provision of dignity kits	Balcad health centre	wardiorg@yahoo.com Hassan Shariff, Tel. +252615563994
-------------	-----------------	--------	--------	---------------------------	----------------------	--

State	Region	District	Organization	Services Available	Village, town or IDP Settlements	Name and contact of focal person (email address and telephone)
South West	Gedo	Bardera	SORDES	Psychosocial Support	Bardera	Farhan Hassan Mohamed. Tel. 0616384444
South West	Gedo	Garbaharay	SORDES	Psychosocial Support	Garbaharay	Mahad Qassim Olad Tel. 0615818272
South West	Bakool	Wajid, Xudur, Tayeglow	DREDO	Psychosocial support, medical referrals and GBV services	Wajid, Xudur, Tayeglow	Dahir Mayow Muktar, Tel 0615010005
South West	Lower Shabele	Baraawe	OSPAD	Psychosocial support, medical referrals and GBV services	Baraawe	
South West	Bakool	Wajid, Xudur, Tayeglow	SCWRD	Psychosocial support, medical referrals and GBV services	Wajid, Xudur, Tayeglow	Adan Ali Tel 0615928661

State	Region	District	Organization	Services Available	Village, town or IDP Settlements	Name
Jubaland	Lower Juba	Kismayo	ARC	Provision of PEP treatment to rape survivors. Case management and Psychosocial support, provision of dignity kits and follow-up and referral.	Kismayo	Fatima Ahmed Ali: +252619840899 Shair Ibrahim, GBV/Protection Manager: +252619840865
Jubballand	Lower Juba	Kismayo	SEDHURO	Medical support, Provision of dignity kits and psychosocial support. IDTR for children and a day care. Support foster mothering for un-accompanied minors. Legal Aid Assistance for GBV Survivors.	Kismayo	Hassan Abdi Ali, GBV Focal Point/ Protection Officer
Jubballand	Lower Juba	Kismayo	SWACEDA	Medical support to GBV cases, psychosocial support	Fanoole Village	Abdirahman, Tel. 061683796
Jubballand	Lower Juba	Kismayo	SRCS	Medical response including provision of PEP kits to Rape survivors.	Kismayo	Hassan Weheliye, Tel. 0615836501
Jubballand	Lower Juba	Kismayo	CEDA	Psychosocial first aid for child rape survivors.	Kismayo	Mohamed.Qadar +252617439441
Jubballand	Lower Juba	Kismayo	Motherland Somalia	Legal assistance and advocacy	Kismayo	Abubakar Mohamed Tel. 0616513311
Jubballand	Lower Juba	Kismayo	WRR	Counselling to GBV survivors, provision of medical treatment and dignity kits to the survivor.	Kismayo	Dekow Yussuf Maalim Tel. 0615924990

Jubba land	Lower Juba	Hagar	SORDES	Medical assistance at MCH/OPD	Hagar	Omar Dagalyahan, Tel. 0615356478
Jubba land	Lower Juba	Kismayo	Ministry of Health	Medical assistance	Kismayo General Hospital	Hussein Kassim Maalim, Tel. 0615877836, Email: husseinkassimali@gmail.com
Jubba land	Lower Juba	Kismayo	ICRC	Medical assistance	Kismayo General Hospital	Dr. Abdulqani Mohamed Mohamud, Tel. 0617495262
Jubba land	Lower Juba	Kismayo	SRC	Medical assistance	Kismayo	Dr. Hassan Wehliye, Tel. 0615836501
Jubba land	Lower Juba	Kismayo	ARC	Medical assistance	Kismayo	Nurse, Hamdi Hassan, Tel. 0619840899/618 908882
Jubba land	Lower Juba	Kismayo	ARC	Medical assistance	Kismayo	ARC Bula Abliko, Nurse, Shukri Sulub, Tel. 0619840899/616 683470
Jubba land	Lower Juba	Kismayo	SWACEDA	Medical assistance	Kismayo	Abdirahman Mohamed Guraa, e-mail: swaceda.org@gmail.com/ sirmed6@gmail.com, Tel. 0612566528
Jubba land	Lower Juba	Kismayo	SEDHURO	Medical assistance	Kismayo	Ali Abshir, Email: a.abshir@sedhuro.org, Tel. 0616524559
Jubba land	Lower Juba	Kismayo	WRRS	Medical assistance	Dalhiska MCH	Abdisamad Mohamed Abdille, Medical Doctor, Tel. 0615250816
Jubba land	Lower Juba	Kismayo	ARC	Psychosocial support	Kismayo	Psychosocial Counsellor, Fatima Ahmed, Email: FatimaAA@arcrelief.org, Tel. 0619840899
Jubba land	Lower Juba	Kismayo	SEDHURO	Psychosocial support	Kismayo	Ali Abshir, Email: a.abshir@seduro.org, Tel. 0616524559
Jubba land	Lower Juba	Kismayo	CEDA	Psychosocial support	Kismayo	Mohamed Qadar, Email: qadar12311@gmail.com, Tel. 0617439441

Jubba land	Lower Juba	Kism ayo	SWACEDA	Psychosocial support	Kismayo	Abdirahman Mohamed Guraa, Email: swaceda.org@gmail.com/ sirmed6@gmail.com, Tel. 0617787039
Jubba land	Lower Juba	Kism ayo	WRRS	Psychosocial support	Kismayo	Nuney Dekow Kalba, E-mail: wrrskismayo@gmail.com, Tel. 0612665787

GBV/SEA/SH Reporting Format

The following is a sample-reporting framework that needs to be updated pending review and considerations by the GBV specialist and appropriate technical experts within UNOPS and the World Bank.

GBV/SEAH Reporting Format

	INCIDENT DETAILS	Guiding Notes
1	Type of Violation	SEA/SH (by UNOPS or IP staff)
		GBV (by third party)
2	Nature of the incident reported	Basic facts of the incident. What was reported by the complainant (in his or her own words). Is the incident related to the project?
3	Source of information	Community Focal Point, GRM Operator, email, other (specify)
4	Where did the incident occur	District
		Region
5	When did the incident occur	Date
6	Additional information (if available)	Sex, Age
<p>The identity and safety of a survivor must be protected at all times. No personal data or identifying information about a survivor or their experience can be shared through this document. Personal/identifying information includes the survivor's name, perpetrator(s) name, date of birth, home address, the exact time and place the incident took place, visible disability, residence status e.g. minority clan or IDP, which can be identified in small village/community settings.</p>		

GBV/SEAH Matrix

Objective:	To increase awareness and enhance response systems for GBV, SEA and SH incidents					
Activity to Address SEA/SH risk	Steps to be taken	Time Lines	Institutional Focal Point	Collaborating actors/relevant ministries	Output indicators	Estimated Budgets (UG)
1. Strengthen institutional capacity for GBV/SEAH risk mitigation and response;						
Strengthen co-ordination and collaboration at national and sub-national levels on the GBV response	Involving the relevant Government units such as the Ministry of Women and Human Rights Development (MoWHRD) and the Ministry of Planning, Investment and Economic Development (MoPIED), in the strengthening of the GBV package of services and referral system in project areas. Coordinate with GBV Sub Cluster	Quarter 1	GBV specialist at PIU	(MoWHRD), (MoPIED), sub-national branches and UN GBV cluster	Government GBV coordination unit created	TBD
Engage a GBV/SEA/H specialist in the PIU	Hire a GBV/SEAH specialist (see ToR in annex)	Month 1 after project signature Maintained throughout Project implementation.	PIU	PIU, UNOPS, WB	GBV specialist is hired and in place	
Review existing regulations to include GBV/SEA/SH prevention and response – IPs and Partners: Existing GBV/SEA/SH Policies and procedures. Misconduct response systems Whistleblowing policies	Review civil service acts and regulations to include commitment to maintaining a protective	Quarter 1 To continue during Project Implementation	GBV specialist at PIU	WB, UNOPS	GBV/SEA/H prevention and mitigation measures included in policy documents	TBD

		<p>environment free from GBV/SEA/SH¹⁸².</p> <p>Define the requirements to be included in the CoC which addresses GBV/SEA/SH</p> <p>Conduct capacity building activities on GBV/SEA/SH</p>				<p>CoC requirements elaborated¹⁸³:</p> <p>Number of training activities for IPs and community workers.</p> <p>Number of people trained</p>	
2. GBV/SEA sensitive channels for reporting in GRM							
	Develop/Review GRM for specific GBV/SEA/SH procedures	<p>Undertake internal review of GRM for GBV/SEA/SH reporting channels</p> <p>Identify and Integrate GBV/SEA/SH entry points within the GRM with clear procedures and tools for management of related complaints</p>	Quarter 1			<p>GBV/SEA/SH procedures integrated in the GRM</p> <p>Variety of reporting channels for GBV/SEA/SH identified</p>	
	Train GRM Operators on key protocols: referral, reporting and confidentiality	<p>Develop training materials on GBV/SEA/SH reporting for GRM Operators</p> <p>Conduct training of GRM operators on GBV/SEA/SH</p>	Quarter 1	GBV specialist PIU	GBV specialist, WB, UNOPS	GRM Operators trained on GBV/SEA/SH protocols	
3. Establishment of a GBV/SEA Reporting Protocol and referral pathway							
	Develop key protocols for GBV/SEA/SH reporting and management	Develop and update disclosure and reporting guidelines / protocol for GBV/ SEA/SH with provisions for confidentiality, informed consent	Quarter 1 and review periodically	GBV specialist PIU	GBV specialist, WB, UNOPS	Number of GBV/SEA cases reported and documented	

¹⁸² The GBV specialist will link up with other similar efforts in WB supported operations

¹⁸³ Minimum CoC requirements: Provisions for addressing GBV/SEA, Prohibitions against sexual activity with anyone under the age of 18.. Mistaken belief regarding the age of the child and consent is not a defense for engaging in sexual activity with minors., associated to accountability frameworks of the SEAH Action Plan and sanctions for GBV perpetrators

	<p>and survivor protection and assistance.</p> <p>Create reporting pathways that include support systems and accountability mechanisms including how to handle SEA/SH allegations properly</p> <p>Develop simple, anonymous and confidential tracking system that PSEA focal points can use to document GBV incidents to service providers.</p> <p>Review logs for GBV/SEA/SH documentation to ensure it follows standards for documenting GBV/SEA/SH cases</p>					
4. Communication to project affected communities about GBV/SEA/SH risks and mechanisms						
	<p>Community awareness on GBV/SEA and disclosure of CoC</p> <p>Create IEC materials on GBV/SEA</p> <p>Identification of child friendly and women safety areas for disclosure of information</p> <p>IOC available to communities in the local language</p>	<p>Quarter 1 And during project implementation</p>	<p>GBV specialist PIU</p>	<p>GBV specialist, WB, UNOPS</p>	<p>IEC materials created and disseminated with a gender perspective</p> <p>CoC available and translated</p>	
	<p>Communicate GBV/SEA risks and options for reporting at the community level to create GBV awareness and enable project affected people to file complaints</p>	<p>Community awareness campaign on GBV/SEA and GRM reporting mechanism</p>	<p>Quarter 1</p>	<p>GBV specialist PIU</p>	<p>GBV specialist, WB, UNOPS</p>	<p>Community awareness campaign developed in all project sites</p>
5. Sensitization and capacity building of PIU, GRM, Workers, Service Providers and Partners on SEA/SH in the project						

	Codes of Conduct signed and understood.	Review CoC for provisions/clauses that guard against GBV/SEA/SH Save CoCs signed by all personnel Train all project-related staff on the behavior obligations under the CoCs.	In Quarter 1	GBV specialist	PIU, IPs, UNOPS	number of workers that have signed a CoC	TBD
	All direct workers, partners, sub-contractors, supplier and SEA focal points trained on GBV/SEA/SH	Develop training session and materials Training should include explanation of GBV/SEA/H, expectations for behavior and conduct, sanctions for violations, roles and responsibilities of actors involved, GBV incident report mechanism, accountability and referral procedures.	In quarter 1	GBV specialist	PIU, WB, UNOPS,	Number of workers who have attended GBV/SEA/SH training	
6. Conduct GBV risks assessments at project sites							
	Assess GBV risks in project sites	Develop/adaptation of safety audit tools Conduct periodic safety audits Include safety audit recommendations in project sub-components	Every quarter	GBV specialist, PIU	PIU, IPs	Safety audit reports developed in all project sites Safety audit recommendations in project sub components	
7. Strengthening GBV services providers							
	Assessment of capacity of GBV service providers in project sites	Classification of existing Service Providers according to their technical capacity on GBV (according to global standards) to update existing referral pathways.	1 Quarter	GBV specialist	PIU, UNOPS, WB	Report with classification of GBV providers Number of GBV service providers contracted	

		Provision of funding for Implementation Agency (PIU), to recruit GBV Service Providers in project areas to facilitate access to timely, safe and confidential services for survivors.					
8.	Appoint PSEA Focal Points						
	Identify, train and establish project focal points for GBV/SEA	Development of ToRs for GBV/SEA/SH focal point Establish a trained, dedicated and committed network of project GBV focal persons	Quarter 1 Maintained throughout Project implementation.	PIU, GBV specialist	PIU, UNOPS	Focal Point ToR developed No. of focal points and persons identified and trained	TBD
9.	Establish a GBV/SEA Accountability framework						
	Develop and accountability framework	Develop protocol with specific roles and responsibilities for parties on verification, investigation and management of cases within Government and IPs Develop specific sanctions as per type of GBV violation	1 Quarter	GBV specialist, PIU, IPs	PIU, WB, UNOPS, IPs	Accountability framework developed	
1 0.	Establish an M&E system of the GBV/SEA Plan						
	Develop a Supervision Plan of GBV plan	Hire a Third Party monitoring Agent to track implementation of GBV/SEA/SH risk management measures Design responsibilities in the monitoring system to IPs, GBV/SEA/SH focal Points and PIU	1 Quarter	GBV specialist, PIU	PIU, WB, UNOPS,	M&E Plan developed M&E Plan implemented PIU progress reports on GBV/SEA/SH	

	PIU should report on GBV/SEAH/SH in regular progress reports						
--	--	--	--	--	--	--	--

Sample Terms of Reference - GBV technical expert within the Project Implementation Unit (PIU)¹⁸⁴

1. BACKGROUND AND JUSTIFICATION

Effectively addressing gender-based violence contributes to the achievement of the World Bank's twin goals of poverty reduction and shared prosperity by increasing women's and girls' ability to participate in society and livelihood opportunities. Gender-based violence (GBV)¹⁸⁵ – including sexual harassment, exploitation and abuse – is a prevalent feature in settings across countries where the World Bank operates; recent estimates by WHO indicate that 35 per cent, or roughly one in three, women worldwide have experienced some form of physical or sexual assault in their lifetime.

The costs of GBV, both direct and indirect, are a staggering burden for households and economies. While the time horizon for reducing gender-based violence is necessarily affected by the need to shift norms and attitudes that underlie GBV given the widespread acceptance of violence against women and girls, it is generally agreed that effective interventions at the programming and project level in several sectors could help change attitudes and behaviors and enhance women's ability to participate and benefit from development programs.

There is recognition as well that development operations, including those supported with World Bank financing can increase or introduce new risks of GBV, including the risks of sexual exploitation and abuse (SEA), as well as sexual harassment (SH). These risks can manifest in different ways by a range of perpetrators linked to the implementation of operations both in the public and private spheres, for example, through the large influx of workers, which may increase risk of transactional sex, change power dynamics at home, contribute to redistribution of land where women are typically excluded from land titles, or the lack of safe ways of facilitating access to work for women.

Identifying and understanding both project-related and existing contextual risks linked to GBV and particularly sexual harassment, exploitation and abuse is important to ensure that Bank-supported projects do not contribute to or exacerbate existing dynamics or vulnerabilities perpetuating violence. This should be accompanied by decisive action to develop appropriate prevention and mitigation measures integrated into project design and to be monitored throughout project implementation.

Preparation of the Somalia Crisis Recovery Project (SCRIP) highlights potential project-related risks of SEA/SH that will require protective mitigation measures and establishment of response mechanisms to address. Mitigation measures to be integrated into and monitored throughout the life of the project have been identified in alignment with IASC principles and in accordance with the World Bank guidance and standards on GBV risk management.

As part of the GBV risk management process, the Project Implementation Unit (PIU) seeks a GBV specialist, with experience addressing SEA/SH, who will be responsible for supporting the Project Implementation Team in the identification, mitigation and response to these risks as part of project implementation.

¹⁸⁴ World Bank, Somalia GBV Assessment Portfolio Review, 2020, p. 94.

¹⁸⁵ GBV includes a range of violations, including i) intimate partner violence; ii) non-partner sexual abuse; iii) harmful practices; iv) human trafficking and v) child sexual abuse. It is expected that the country and regional integration profiles will highlight the most prevalent forms of GBV within each country and provide considerations for how to address these risks most effectively. <http://www.worldbank.org/content/dam/Worldbank/document/Gender/Arango%20et%20al%202014.%20Interventions%20to%20Prevent%20or%20Reduce%20VAWG%20-%20A%20Systematic%20Review%20of%20Reviews.pdf>

2. CONTEXT OF THE PROJECT

The Project Development Objective (PDO) is to “support the recovery of livelihoods and infrastructure in flood and drought affected areas and strengthen capacity for disaster preparedness nationwide.”

This objective will be achieved through: (a) early and integrated recovery from the immediate floods and drought shocks; (b) medium-term rehabilitation of flood damaged infrastructure and services; (c) longer-term integrated solutions for flood risk management; and (d) developing sustainable institutional models for crisis recovery and preparedness through public sector-civil society collaboration.

Component 1: Provision of immediate basic services and livelihood support

1) *Providing cash-for-work* (conditional) for short-term income assistance to vulnerable households across flood affected districts in Hirshabelle, South West, and Jubaland in exchange for low-skilled manual labor for simple light works. 2) *Immediate desert locust preventive activities* at a national level will provide surveillance to guide control operations and livelihoods assistance; 3) *Restoring and protecting agricultural crop production*; 4) *Preventing vector-borne diseases to livestock* will provide enhanced monitoring and preventive and curative treatment of vector-borne diseases to ensure the good health of livestock in riverine flood-affected areas; 5) *Accelerating the revitalization of basic health service provision* will provide basic package of health services, including strengthening of GBV service provision and referral pathways for survivors of GBV; 6) *Provision of health and nutrition services* and 7) *Supporting household hygiene promotion and treatment*, such as hygiene promotion campaigns and the distribution of chlorine tablets.

Component 2: Enabling medium-term flood recovery and resilience-building will support the rehabilitation of the following critical infrastructure in line with build-back smarter standards, and community level structural mitigation efforts for slope protection and environmental rehabilitation.

Component 3: Supporting longer-term disaster risk management and preparedness will set the analytical and policy groundwork and capacities to enable a government-led, integrated approach to flood and drought risk management and preparedness

Component 4: Project Management. This component will support overall Project management and coordination by the Project Management Unit located the Ministry of Finance including: financial management (FM), procurement, monitoring and evaluation (M&E), environmental and social safeguards (EFS) compliance, technical quality assurance, preparation of subproject designs and construction supervision services, grievance redress, and GBV/SEA and referral and protection. An independent verification agent (IVA) will validate results. The PMU is expected to provide close implementation support to the FMS and state level project implementation units by engaging a technical advisory consultancy.

Component 5: Health Contingent Emergency Response for Epidemics. (i) providing health and nutrition services in Somalia’s Essential Package of Health Services; (ii) setting up temporary field health facilities; (iii) strengthening the ability of the primary health system to diagnose emergency pathogens (iv) developing an emergency operations and response center; (v) strengthening Somalia’s Integrated Disease Surveillance and Response System to Detect Pathogens; and (vi) supporting emergency response communications.

Component 6: Anticipatory and Recovery Support for Addressing Food Insecurity: This component will include the following two subcomponents:

- Subcomponent 6a: Anticipatory Action and Early Response Support to Food Insecure Communities. This will include: (a) Immediate Rehabilitation of Small-Scale Community Irrigation and Water Supply Infrastructure, and; (b) Immediate Provision of Fishing Inputs and Infrastructure to Coastal Communities, and related training and awareness. These activities will be undertaken using the 'Inputs for Assets' approach under which agricultural and fishing inputs will be provided to communities in return for their participation in water and fisheries infrastructure. This component will also retain the option of providing agricultural and fishing inputs unconditionally to more vulnerable groups or if otherwise warranted by local circumstances.
- Subcomponent 6b: Medium-term Sustainable Recovery and Resilience of Food Insecure Communities. This will include the rehabilitation and reconstruction of : (a) Larger Drought-Mitigating Water and Irrigation Infrastructure¹⁸⁶ ; (b) Fishing Coastal Community Infrastructure and Value Chain Resilience, and; (c) capacity building, training and awareness building of government and communities for recovery planning, scheme design, operation and maintenance and technical oversight for the planned water and fishery infrastructure works, and operation and maintenance under clear ownership and management arrangements. This component will employ routine design and contracting methods while maximizing the use of labor-intensive methods, where applicable.

Contingency Emergency Response (CERC). In anticipation of activating the CERC to respond to an emergency, an Emergency Response Operations (EOM) Manual will be prepared by the PIU as a condition of disbursement and annexed to the POM.

To support E&S capacity, and in particular GBV/SEA/H risk management, a GBV Specialist will be recruited under RCRF 3 for the Federal Government of Somalia. There will further be close coordination with the Ministries of Health, Education and other relevant stakeholders for the implementation of the project. The PIU GBV Specialist will also liaise in particular with a GBV technical expert and Senior Social Development Specialist within the World Bank team.

3. NATIONAL CONTEXT IN RELATION TO GBV

GBV is widespread in Somalia, and considered to be a major obstacle to equality, peace and development in the country. Despite the lack of comprehensive and reliable national population based GBV prevalence data, information that does exist indicates that GBV is common in the lives of women and girls across the life course in Somalia, with some forms of GBV endemic. Intimate partner violence and sexual violence, the most prevalent types of GBV globally, are both commonplace in the lives of Somali women and girls. FGM/C has in the past been near universally practiced.

Some forms of GBV are normative in Somalia, including FGM/C, child marriage and some intimate partner violence behaviors, in particular a man's use of physical violence to discipline or control his wife under certain circumstances.¹⁸⁷Other normative forms of GBV in Somalia include cultural practices of abduction and forced marriage and widow inheritance.¹⁸⁸The extent to which each type of GBV is practiced and normative varies across and within the three regions of the country, and there are indications of apparent shifts in beliefs and attitudes that support FGM/C, child marriage and intimate

¹⁸⁶ This would include existing infrastructure damaged by conflict, natural disasters or infrastructure that may have fallen into disrepair due to neglect and deferred maintenance.

¹⁸⁷ International Alert/CISP, *The Complexity of Sexual and Gender-Based Violence: Insights from Mogadishu and South Central Somalia*, International Alert, 2015, Nairobi.

¹⁸⁸Norwegian Country of Origin Information Centre (2018) *Somalia: Marriage and divorce*, Land info, Oslo.

partner violence within Somalia, as discussed in more detail in the next section. However, in the absence of reliable quantitative and qualitative research, it is hard to assess the degree of attitudinal change.

Conflicts, disasters and insecurity have in the past, and continue to, exacerbate risks associated with child marriage and intimate partner violence in Somalia. The effects that displacement has on increasing GBV risks and rates among internally displaced and refugee communities globally is increasingly recognized,¹⁸⁹ and evidence points to a similar escalation of violence against women catalysed by conflict and climate-related displacement and associated stressors in Somalia. Child marriage has been adopted as a past coping strategy for drought-affected families in response to acute economic insecurity,¹⁹⁰ and the altered economic and social dynamics resulting from displacement have been linked to increased intimate partner violence perpetration among displaced populations in Somalia.¹⁹¹

As well as exacerbating child marriage and intimate partner violence, conflict and disaster-related displacement magnifies sexual violence risks for women and girls in Somalia. Women and girls are at amplified risk of sexual assault during movement to new areas and once settled in displaced settings. Unsafe environments, eroded protection mechanisms and social cohesion, and a lack of safe livelihoods options all increase the incidence of opportunistic sexual violence perpetrated in and around displaced settings when women and girls are collecting water, firewood and other resources, and when in public spaces and accessing public facilities.¹⁹²

Sexual exploitation and abuse of children and women by people in positions of authority and power are reportedly common in Somalia, and as elsewhere, linked to poverty, insecurity and impunity.¹⁹³ Although the issue remains under-researched due to the significant sensitivities associated with it, there is evidence of high levels of sexual exploitation and abuse by domestic and foreign security forces and by civilians.¹⁹⁴ Anecdotal evidence from humanitarian and development agencies indicate that sexual exploitation and abuse is a largely unreported and significant problem in the country.

Ongoing insecurity in the country coupled with the increase in climate-related shocks and disasters are likely to create ongoing population displacement, further entrenching poverty among internal migrants and increasing exposure to GBV risks. Displaced, migrant and women from minority clans, or with no clan affiliation, are at particular risk of sexual exploitation and abuse and sex trafficking because of the double

¹⁸⁹Vu, A. et al 'The prevalence of sexual violence among female refugees in complex humanitarian emergencies: a systematic review and meta analysis', in *PLOS Currents Disasters*: Stark, L and Ager (2011) 'A systematic review of prevalence studies of gender-based violence in complex emergencies', in *Trauma Violence Abuse* 2011;12:127–34.

¹⁹⁰Ministry of Planning, Investment and Economic Development, *Somalia Drought Impact & Needs Assessment*, Federal Government of Somalia, 2017, Mogadishu; Girls Not Brides, *Child Marriage in Humanitarian Settings*, Girls Not Brides, 2018, London; Myers, J. *Untying the Knot: Exploring Child Marriage in Fragile Settings*, World Vision UK, 2013London.

¹⁹¹Oxfam Rapid Gender Analysis for Oxfam Drought Response in Somaliland, Oxfam, June 2017.

¹⁹²Ministry of Planning, Investment and Economic Development 2017; Refugees International *On the Edge of Disaster: Somalis forced to flee drought and near famine conditions*, 2017, RI, Washington DC; Human Rights Watch, *Here, Rape is Normal*, HRW, 2014aNew York.

¹⁹³ See Reports of the United Nations Secretary-General on Sexual Violence in Conflict S/2019/280 and 2018/250; Human Right Watch (2014b) "The Power These Men Have Over Us" *Sexual Exploitation and Abuse by African Union Forces in Somalia*, HRW, New York.

¹⁹⁴Human Rights Watch 2014.

discrimination they face due to their economic and social vulnerability, discrimination and lack of access to protective resources and redress mechanisms.¹⁹⁵

Sexual violence, along with other violence, is said to have become normalized in Somalia. This apparent normalization appears to be the result of sustained exposure to elevated levels of sexual violence over past decades compounded by the lack of national and community-level communication, discussion and dialogue about sexual violence and other forms of GBV.¹⁹⁶ This combination of high levels of exposure and low levels of public and private discourse have created an environment which not only enables violence against women and girls to continue, but also curbs national and community-level awareness, commitment and action to do something about it.

In addition to existing contextual risks of GBV in Somalia, the following factors, which may contribute to creating or exacerbating the risks of GBV, including SEA/SH, have been identified:

- **Abuse of power and discrimination in priority-setting and community engagement processes:** Women, girls and other groups that have less power and status such as people with disabilities, unmarried women/girls, women and girls associated with armed groups/forces, displaced/returning individuals and families and minority ethnic/clan groups are more likely to be invisible or hidden in community consultation and engagement processes. Additionally, patriarchal norms in Somali society often lead women and girls – of all groups – to be left out of community discussions or to have their needs and priorities silenced. This exclusion from spaces of voice, agency and decision-making can lead to decisions that further harm or marginalize them.
- **Patriarchal norms that lead to specific, normative, designs based on male, able-bodied models and priorities in traditional master plans:** In urban design and planning projects – including road construction – and/or adherence to current neighborhood plans – women and girls’ exclusion from planning and design spaces can result in permanent designs and urban infrastructure that either ignores, or exacerbates, women and girls’ risks of GBV/SEA in the city and/or when accessing urban services. For example, primary roads located too close to areas where women and girls need to go for services, including in the evening. Secondary roads important for women and girls’ use (for example, to access/fetch local water resources or markets) but that are poorly lit, or overly isolated from sufficient protective foot traffic.
- **Abuse of power, including sexual exploitation and abuse and bullying, in hiring, employment, and retention practices:** Hiring and employment practices that seek to increase the number of women in different employment positions – from skilled labour in Ministries and within contractors (i.e. engineers) to community engagement officers – can expose women to incidents of sexual exploitation (pressure to perform sexual acts in exchange for work), harassment, or violence; for example when moving about communities and/or engaging with male leaders and/or community members. Additionally, unequal gender norms and harmful beliefs (such as the idea that a woman moving about on her own might not have clan protection and is a legitimate target for abuse, harassment, violence, etc) run the risk of creating hostile environments for female staff members at both the skilled and unskilled levels. In those

¹⁹⁵ International Alert/CISP 2015; Wirtz A.L, Perrin N.A., Desgropes A. et al, Lifetime prevalence, correlates and health consequences of gender-based violence victimisation and perpetration among men and women in Somalia', *BMJ Glob Health* 2018;3; El Bushra, J. and Sahl, I.M.G., *Cycles of Violence: Gender relations and armed conflict*, ACORD, 2015, Nairobi.

¹⁹⁶ International Alert/CISP 2015.

situations, where female staff – skilled and unskilled – have less time available for traditional gender role related duties in the household such as child care, there is also a risk of increased IPV as household members push back.

- **Abuse of power, including sexual exploitation and abuse, in dissemination of accurate information on available services and avenues for grievance redress:** Misinformation or lack of information throughout the components of the project can lead to harm and violence towards different strata of communities, especially those with less agency and power. For example, community engagement officers may charge families a nominal fee to participate in engagement processes for their own economic benefit when the engagement process is designed to be free. Information and education dissemination activities must engage and reach out to all within society; corresponding monitoring and safeguards, such as grievance redress mechanisms can mitigate some of this risk.
- **Community conflict resolution approaches can lead to more harm, including against survivors who report GBV/SEA experiences:** Community or local governance resolution processes might reinforce gender inequality pushing for resolutions that widen inequalities, are not survivor-centered and may lead to impunity and more harm to a survivor (through marriage to a perpetrator, re-victimization or other consequences).

The SCRP was assessed to be High risk. Consequently, the Project will need to put in place certain measures in order to mitigate the risks of GBV and generally comply with the standards and good practices to address GBV risks, including those developed in the World Bank's SEA/SH Good Practice Note.

As part of this process, the following measures will be put in place to enable management in a satisfactory manner the mitigation and response to GBV risks linked to project implementation.

Key measures will include among others:

- Mobilization of a GBV Expert within the SCRP and if needed, occasional recruitment of consultants to support the GBV Expert;
- A mapping and quality assessment of GBV support services available with a minimum package of services provided where necessary to inform development of referral pathways for the project;
- Consultations with female beneficiaries at the community level;
- Awareness raising and sensitization of neighboring communities on GBV issues and the potential risks associated with the project as well as on the risk mitigation measures implemented in the project implementation areas;
- The training on and signing of Codes of Conduct by all the people working on the project that include specific measures related to SEA/SH;
- The establishment of a gender- and GBV-sensitive grievance management mechanism (GM) that will be considered by the project, including development of response protocol should cases of SEA/SH and GBV arise;
- Training on GBV provisions for workers in companies as well as for community actors, such as focal points linked to local complaints management committees, and other stakeholders; and
- Continuous training of project staff on GBV, the appropriate response to cases of GBV, and the implementation of the code of conduct and the GM;
- Development of a SEA/SH Prevention and Response Action Plan that consolidates information related to key risks, mitigation measures, referral pathways and protocols, an Accountability and

- Response Framework, a Reporting and Response Framework, and training and sensitization requirements;
- Ensuring procurement processes, where relevant, include evaluation of GBV/SEA/SH risk management requirements, including consideration for associated costs;
- Ensure associated GBV expertise is built into capacity of supervision consultant – this could include hiring of additional technical expertise or in-depth training of associated staff on GBV risk management requirements;
- Enabling financing for contracting of GBV service providers to support the project;
- Integrating oversight of implementation of GBV risk management requirements in the responsibilities of a Third Party Monitor

These terms of reference define the general mandate, the specific tasks as well as the profile of the GBV Expert to be recruited within the SCRP.

4. OBJECTIVES

The general objective of this position is to support GBV Risk Management Requirements including additional identification, prevention, risk mitigation, and response to GBV risks, including SEA/SH, related to project implementation.

The specific objectives of the GBV Expert's mandate are as follows:

- Help the project to identify any additional GBV / SEA/SH risks linked to the implementation of the project and to develop risk mitigation strategies through the integration of risks and related mitigation measures in key safeguard instruments, such as the project Environmental and Social Management Framework;
- Support the project in the implementation and coordination of prevention, risk mitigation and response activities, by supervising the contracts of service providers and services of any additional GBV specialist consultants, ensuring the ethical and appropriate implementation of the GM, by collaborating with the other members of the Project Implementation Unit (PMU), especially the Environmental and Social Safeguard Specialists, and by coordinating the actions planned with the project partners and the government structures involved in its implementation; and
- Support the PIU in the monitoring and evaluation of activities related to prevention, response, and mitigation of GBV risks, by ensuring the ethical monitoring of key indicators related to prevention and response activities and the operation of GM, and contributing to the periodic reports and to the SEA/SH Prevention and Response Action Plan.

5. KEY TASKS OF THE GBV EXPERT

Under the authority of the Project Coordinator, the GBV Expert will ensure that considerations related to GBV risks are taken into account in the implementation of all the activities of the SCRP.

The specific tasks of the GBV Expert within the PCU can be summarized as follows:

1. Identification of GBV / EAS / HS risks and design of risk mitigation strategies for the project:

- Contribute where relevant/needed to the development of GBV aspects of key safeguard requirements, and ensure the integration and implementation of risk mitigation measures for GBV / SEA/ SH in key instruments, including any updates to the Environmental and Social Management Framework (ESMF), which also includes the GBV Action Plan; the Environmental and Social Management Plans (ESMPs); the Labor Management Plan (LMP); the Security Management Plan (SMP); the Resettlement Policy Frameworks (RPF) and the Stakeholder Engagement Plan (SEP);

- Ensure that the GBV risk assessment is integrated into the social assessment that is part of the C / ESMP which will be carried out during the preparatory phase of the project and is also updated throughout the implementation of the project and in developing or adapting the GBV Action Plan; and
- Contribute to the monitoring and evaluation of the GBV elements of the environmental and social safeguard documents prepared within the framework of the project.

2. Implementation and coordination of prevention and response activities as well as risk mitigation:

a) Supervision of service provider contracts:

- Contribute to the integration of specific GBV clauses in the Bidding Documents (SBD) and / or Quotation Request Files, as well as in the contracts, in the terms of reference and in the service provider codes of conduct (companies, control missions, etc.); and
- Contribute to the evaluation of the providers' bidding documents in order to ensure that the effectiveness of the contractor's GBV risk mitigation plan is taken into account.

b) Supervision of consultants or NGOs specializing in GBV:

- Contribute to the development of terms of reference for the recruitment of GBV consultants or NGOs who can be hired to support the implementation of GBV prevention and response activities, including risk mitigation measures, for the attention of the communities affected by the project and the staff of SCRP and of the various construction sites open in the project intervention areas;
- Supervise all of activities of technical specialists, which could include the development and validation of quality service mapping, community consultations, stakeholder training, awareness campaigns, and close monitoring of partners and project staff; and
- With the support of technical specialists where necessary, ensure the development and implementation of a GBV training plan throughout the project, which will include, among others, workers, project staff, as well as community actors, and who will address the risks of GBV, the appropriate and ethical response to cases of GBV, and the implementation of the code of good conduct and the MGP.

c) Support for the implementation of the grievance mechanism (GM):

- Ensure coordination and implementation of the GM on GBV-related issues within the framework of the project, including development of a response protocol for GBV cases, ensuring a "survivor-centered" approach" in the project to ensure that survivors of GBV incidence receive medical, psychosocial and legal assistance in accordance with their needs, subject to the consent of the survivor, while respecting their right to confidentiality and safety (this will include regular monitoring in the field to verify the proper functioning of the GM, the appropriate entry leads, and the quality of services in the referral circuit); and
- Ensure compliance with the guiding principles regarding confidentiality and safety in the ethical collection, storage, and sharing of data related to GBV complaints.

d) Coordination and collaboration:

- Collaborate with the other experts of the PCU, in particular the environmental and social safeguard specialists, within the framework of their activities;
- Participate in periodic project coordination meetings and, if necessary on site, in order to collect feedback from companies and providers on the implementation of the GM, in order to be able to adapt the mechanism using lessons learned; and
- Inform and involve, where appropriate, government structures at the level of intervention on GBV risk mitigation activities and measures carried out within the framework of SCRP.

1. Implementation of GBV activities under the main project component.

The GBV specialist of the PIU will ensure close coordination with the Ministries of Health, Education and other relevant stakeholders for the implementation of the project components. The PIU GBV Specialist will also liaise with a GBV technical expert and Senior Social Development Specialist within the World Bank team. Mainstreaming gender activities in project components includes

- *Accelerating the revitalization of basic health service provision* will provide basic package of health services, including strengthening of GBV service provision and referral pathways for survivors of GBV
- Mainstreaming gender in Project management: including GBV/SEA/SH referral and protection mechanisms in all project components
- Mainstream gender in the provision of health and nutrition services in Somalia's Essential Package of Health Services;

2. Monitoring and evaluation:

- a) Monitoring of various activities and indicators:

- Put in place the monitoring and evaluation plan for activities relating to the prevention and management of GBV cases, in coordination and with the support of the monitoring and evaluation specialist from the World Bank, together with performance indicators and their target values, which will allow the GBV Expert to systematically and in accordance with the guiding principles and good practices, collect feedback from the community on the functioning of the GM and other survivor-related care;
- Support the monitoring of indicators relating to the functioning of the GM, in particular concerning the reporting and follow-up of GBV complaints related to the project (this must be done while respecting the response protocol for GBV cases and the guiding principles for case management of GBV);
- On the basis of the information collected directly and provided by the supervision consultants, keep up to date and share periodically a monitoring tool (eg, table) summarizing the information relating to the contracts of service providers or consultants relating to GBV, signing of CoCs, and training dates for workers in the companies and also for project staff; and
- Document the good practices or success stories experienced following the implementation of GBV risk mitigation measures.

- b) Analysis of data and activities:

- Evaluate project activities to assess the adequacy with national and World Bank requirements in terms of prevention and management of GBV cases;
- Analyze key gaps between achievements and targets and make any appropriate recommendations to improve performance in terms of prevention and management of GBV cases; and
- Propose adjustments to program activities for the prevention and management of GBV cases and the appropriate measures to ensure their proper execution.

c) Reporting:

- Write periodic reports (monthly, quarterly and annual) summarizing progress of the implementation of GBV risk mitigation measures for the project and the services of the companies and support consultants; and
- Contribute to the preparation of annual action plans, as well as to the drafting of periodic project reports (monthly, quarterly and annual) and ensure that GBV aspects are adequately taken into account in said reports.

4. REPORTS

The GBV Expert will prepare monthly, quarterly and annual activity reports to be integrated into the preparation of monthly, quarterly and annual activity progress reports of the project's environmental and social safeguarding aspects. These reports will take stock of the achievements of the month, quarter or year, will present the main issues raised and the solutions provided, together with the strengths and weaknesses of the actions carried out. Said reports will be due no later than seven (7) days, fifteen (15) days and one month respectively after the end of each period concerned.

5. PROFILE OF THE CANDIDATE

- Holds of a Bac + 5 Diploma or equivalent, in social sciences, law, project management, or any other similar discipline;
- At least eight years of overall professional experience;
- At least five years of experience in supervising GBV prevention and response activities;
- At least five years of experience in conducting awareness campaigns on women's rights, gender equality, GBV, and / or reproductive health considered an asset;
- Excellent knowledge of the guiding and ethical principles that govern work with survivors of GBV and good practices in the implementation of activities to prevent and address GBV;
- Good experience in data collection and analysis on GBV;
- Good knowledge of the World Bank's environmental and social safeguard policies;
- Good knowledge of relevant legislation/legal frameworks in Somalia in the area of GBV;
- Excellent command of Somali and strong ability to write reports;
- Knowledge of an additional language (English) would be an asset; and
- A good command of IT tools (word processing, spreadsheets, Internet and Intranet, etc.).

6. DURATION AND LOCATION OF ASSIGNMENT

[INSERT DURATION OF EXECUTION ACCORDING TO THE COUNTRY WORK CODE, ex. The duration of the mission is renewable one year with a trial period of three (3) months.] The renewal is not validated until after the satisfactory performance evaluation of the GBV expert approved by the World Bank.

The assignment is planned within the PIU of the Ministry of Finance for the Federal Government of Somalia. One-off missions within the country to the project sites may be necessary for the proper execution of the mandate.

The procurement process will be conducted using the competitive processes in accordance with the new World Bank procurement regulations.

Annex 5: Procedures for Managing Contractors

This procedure was developed consistent with the World Bank Group ESHS Guideline which incorporates the IFC ESHS Guidelines, under the “Good Practice Note: Managing Contractors’ Environmental and Social Performance”. This is to remind the borrower’s responsibility to comply with the ESHS Guidelines, loan agreement commitments, ESIA, local laws and regulations, and permits and standards, ensuring that any contractor providing services of any kind to the implementing entity duly follows these requirements throughout the duration of the contract, including any activity or services performed by subcontractors or third parties undertaking a contract from the contractor.

The PIU may not have direct control over subcontractor performance, although it may have some influence over selection and will supervise their E&S performance. Therefore, the PIU must use their direct control over their contractors to ensure that E&S requirements are being met by subcontractors. To achieve this commitment, the implementing entity should require contractors to include in subcontracts the requirement to comply with all the relevant World Bank Safeguards standards and all E&S requirements that are appropriate for the works being subcontracted and consistent with the implementing entity’s and the contractor’s E&S management programs.

Understanding Implementation Responsibilities

The roles of the PIU and implementing partners / contractors in meeting E&S requirements are usually intertwined and must be worked out at the project level. Some actions described below as being the responsibility of the client or the contractor may be reversed or shared on some projects. In some cases, such as stakeholder engagement, both PIU and contractors will have certain obligations and limits and will need to coordinate their efforts. In others, such as monitoring, each party will monitor E&S performance, but at different frequencies and levels of detail. In all cases, the PIU remains ultimately responsible to World Bank for ensuring E&S requirements are met, with the responsibilities of the contractor defined in the contract. For design-build (or design-build-operate) contractors, the design standards and requirements (and operation standards) will also be set out in the terms of reference to the contract. For public-private partnership (PPP) projects the administration may also have roles and responsibilities (to the Bank) which may be additional to their usual regulatory functions.

Contractor Oversight

The PIU will monitor contractor and subcontractor E&S performance and ensure the contractor monitors its own and all subcontractors’ E&S performance throughout construction, including mobilization, the main construction phase, and demobilization. Clear responsibilities and reporting lines are essential to avoid duplication of effort or, conversely, gaps in monitoring. If operations are carried out under contract, or some work is performed by contractors, the PIU and contractor will monitor E&S performance during operations as well. Overall, the client will require that all contractors engaged on the project operate in a manner consistent with the requirements of the ESSs, including the specific requirements set out in the Environmental and Social Commitment Plan (ESCP).

The PIU should require contractors to report on an agreed frequency their E&S performance and metrics (which shall include relevant information and data from subcontractors, as applicable). Timely reporting of E&S performance and results enables the client to identify opportunities for improvement, prevent poor performance issues, and assist contractors if remedial action is to be taken.

E&S Performance Meetings

Regular meetings are essential to ensure contractor performance is satisfactory and that project specifications are being met. Experience has shown that the PIU may share performance-monitoring results at weekly meetings with all contractors to effectively drive improved performance by introducing a competitive element, sometimes with small incentives. The authority of monitoring staff who control contractor performance also needs to be clarified and understood by contractors (for example, who gives instructions to stop work or proceed but with modifying the approach, scope, equipment, and so forth).

The PIU should ensure that contractors employ qualified E&S personnel to oversee E&S performance, and that contractor staffing and resources are commensurate with the magnitude and timing of work and potential E&S risks. The PIU should also approve documentation, including for training programs, to ensure all staff are aware of E&S commitments and their part in meeting them.

Review and Approval of Contractor Site-Specific E&S plans

The PIU is responsible for its contractors, meeting all of the project's E&S requirements, it is essential for them to review and approve project E&S management plans and procedures. These might include such plans as working within boundaries (footprint management), protection of biodiversity, land clearing and erosion control, traffic management, labor sources and methods of recruitment of workers, worker accommodation, noise and dust control, and possibly others. Where an E&S Management Plan has not been approved, no works will commence in the area.

Kickoff Meeting

Prior to early work activities, the PIU should hold a kickoff meeting with each of the contractors prior to arriving at the site. Timing of mobilization based on logistical issues, resources, customs delays, and so forth should be considered in the planning. The PIU and contractor project managers and major subcontractors should participate in these meetings. The purpose is to review planned activities and schedules, review E&S requirements (among others), review the roles of the various parties in implementing and monitoring mitigation measures, and agree on project-specific induction and training content. These meetings should include a discussion about control of access to the site, use of security forces if applicable, and how to best coordinate the PIU's security management system and E&S activities at both the base camp (accommodation site) and any remote construction sites. Both client and contractor E&S representatives should be present to reiterate all E&S commitments and establish initial compliance points and coordination requirements during site establishment.

E&S Induction and Training

A general E&S site induction should be mandatory for all workers, with specialized technical E&S training delivered to staff. The degree of training should be based on the project's E&S risks, on the tasks that will be performed, the CoC, including the SEP, and SMP, and on the general E&S provisions that are applicable for all personnel, including contractors and subcontractors. All workers should be made aware of the worker GRM and Project GRM and how to access them. In particular, security contractors should be given detailed training on community engagement and the grievance mechanism, as complaints may be brought to their attention in the first instance, and as contractors are not often included in employee training. Contractors should develop and implement SEA and GBV awareness training for staff at all levels, from contract management to day laborers. Additional training may be needed for staff that will be responsible for implementing, monitoring, and reporting E&S performance. Once the general E&S induction is defined, a series of specific trainings may be required in order to ensure that the requirements, controls, and mitigation measures are well communicated and understood.

PIU Monitoring of Activities

The monitoring of contractor E&S performance by the PIU must be the practice throughout construction, from mobilization through demobilization. This should involve both visits to work locations and reviews of records kept by the contractor and of reports submitted by the contractor. The frequency of site visits should be commensurate with the magnitude of the E&S risks of the activities being carried out and permanence of potential impacts that could result from ongoing activities. Monitoring may be conducted by PIU E&S staff.

The PIU environmental and social officers should review one or more recent inspection reports and the contractor's previous month's E&S progress report prior to visiting the site to monitor the contractor's E&S performance. They should do the same before participating in meetings where the contractor's E&S performance is to be discussed. The PIU will review contractor reports and follow up as needed to ensure timely resolution of issues of noncompliance with E&S requirements. This may include additional visits to the contractor's site or offices, further communications with contractor E&S personnel, issuance of notices of deficiency or warnings to the contractor, and other actions as needed.

At any stage of construction or other work, if the contractor has not taken appropriate action to achieve compliance with E&S requirements after repeated notices of violation and warnings of noncompliance, and significant E&S impacts are occurring or imminent, the PIU should order the contractor to stop work until E&S performance is brought under control and up to acceptable standards.

Contractor Monitoring and Reporting

The PIU should require contractors to monitor and keep records on E&S performance in accordance with the E&S management plans. This may include monitoring of E&S matters, scheduled and unscheduled inspections to work locations, observations made during routine activities, desk reviews, drills, and any other monitoring protocols implemented by the contractor to ensure E&S compliance. The PIU must be familiar with the contractor's monitoring and record keeping system so this aspect of the contractor's performance can itself be monitored.

Responsibilities for monitoring need to be clear between the client and contractor, and results (if client and contractor are both collecting data) must be comparable, for example, collected using the same methodologies, analyzed at the same labs, and using similar equipment, and so forth¹⁹⁷.

The PIU should require contractors to report on E&S performance on at least a monthly basis throughout the construction phase, including mobilization, construction, and demobilization. This could be more frequent for more sensitive E&S projects. It can be part of the overall engineering progress report or a stand-alone E&S report. The table below shows the E&S parameters considered in the reporting of E&S performance.

¹⁹⁷To improve efficiency, responsibilities should be defined early regarding who collects what data. In relation to the data collected by the contractor, the owner should be comfortable with what is being collected and how it is being collected, analyzed, reported, and so forth. This is usually done through the sign-off by the owner on the proposed monitoring plan of the contractor

Parameters to consider for E&S reporting by Contractor at least on a monthly basis

Item	Parameter	Description
1	<i>Safety:</i>	hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
2	<i>Environmental incidents and near misses:</i>	environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.
3	<i>Major works:</i>	those undertaken and completed, progress against project schedule, and key work fronts (work areas).
4	<i>E&S staffing:</i>	new hires and departures, and listing of current staff and titles.
5	<i>E&S requirements:</i>	noncompliance incidents with permits and national law (legal noncompliance), project commitments, or other E&S requirements.
6	<i>E&S inspections and audits:</i>	by contractor, engineer, or others, including authorities—to include date, inspector or auditor name, sites visited and records reviewed, major findings, and actions taken.
7	<i>Workers:</i>	number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, and skill level (unskilled, skilled, supervisory, professional, management).
8	<i>Training on E&S issues:</i>	including dates, number of trainees, and topics
9	<i>Footprint management:</i>	details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
10	<i>External stakeholder engagement:</i>	highlights, including formal and informal meetings, and information disclosure and dissemination—to include a breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups (e.g., disabled, elderly, children, etc.).
11	<i>Details of any security risks:</i>	details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project or from inappropriate conduct from security forces employed either by the client or public security forces.
12	<i>Worker grievances:</i>	details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.
13	<i>External stakeholder grievances:</i>	grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender-disaggregated. Particular sensitivity may be needed around SEA or GBV issues raised.
14	<i>Major E&S changes:</i>	to E&S management, or E&S practices (most often done by the Project Implementing Entity)
15	<i>Deficiency and performance management:</i>	actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or plans for actions to be taken—these should continue to be reported until the client determines the issue is resolved satisfactorily.

E&S Review of Contractor Invoices

The PIU should be part of the process for signing off on all payments to contractors, even if the payment is not for work that is explicitly related to E&S mitigation and performance. E&S staff shall work closely with the project manager (PIU or engineer's project manager, depending on who employs the E&S personnel) to determine if there are any outstanding E&S items and whether including that full or partial payment under specific line items of the bill of quantities should be withheld, either temporarily or permanently, or that there should be some combination of temporary and permanent withholding. This right should be exercised as follows;

- Temporary withholdings should be recommended in case of repeated minor violations of E&S requirements that are not leading to significant impacts on workers, external parties, or environmental resources; minor violations that are not corrected after repeated warnings; or first-time major violations that can be corrected easily and that have not led to permanent E&S impacts. The withheld amounts should be paid upon contractor correction of the deficiency to the client's satisfaction.
- Permanent withholdings should be recommended for minor violations that are not corrected after repeated warnings and that could result in significant impacts; or for any violations that have resulted in significant impacts, including permanent impacts. Some portion of such withholdings may be released upon satisfactory resolution of the issue, but some significant portion must be permanently withheld as a penalty to discourage repeated incidents.
- Payments that are withheld either temporarily or permanently will be all or part of the payment specified for a line item in the bill of quantities, which in turn will be the payment due for a discrete portion of the total works. The PIU should work with the project manager and others as needed to arrive at the amount to be withheld. This amount should not be based directly on the cost of compliance but rather should be somewhat higher than this amount, and based on a specific percentage of the line item in question.
- The contractor should be notified of the specific actions that must be taken in order to receive further payments for the works in question, or to receive payment that has been temporarily withheld.

If the contractor does not take timely action to reach compliance with E&S requirements, the PIU and the project manager should continue to take appropriate action to encourage compliance, which could include orders to stop work, withholding of further payments, and/or escalation of the issue to higher management. If significant impacts are occurring or imminent, the client may notify the contractor that another party will be brought in to deal with the issue and the payment to the contractor will be reduced by the amount paid to the other party, as would be specified in the contract.

Annex 6: Labor Management Procedures

The World Bank's Environmental and Social Standard 2 (ESS2) - Labor and Working Conditions and ESS4 - Community Safety and Health were identified as applicable for the project. In accordance with the requirements of ESS2, Labor Management Procedures (LMP) were developed for the SCRP. The purpose of the LMP is to set out the ways in which the PIU will manage all project workers in relation to the associated risks and impacts. The objectives of the LMP are to:

- (a) Identify the different types of project workers that are likely to be involved in the project.
- (b) Identify, analyze and evaluate the labor-related risks and impacts for project activities.
- (c) Set out procedures to meet the requirements of ESS2, ESS4 and applicable national legislation.

The LMP will be applied with due consideration to the requirements of national laws, the interrelatedness of ESS2 with other Environmental and Social Standards in general and ESS4 in particular.

The LMP will be administered to different types of project workers as follows;

- (a) **Direct Workers.** People employed directly by the Ministry of Finance / PIU to work specifically in relation to the project in the PIU Mogadishu, as well as in other sites where the PIU may establish offices. The category will also include any personnel directly contracted by FGS or FMS Ministries or entities at various project sites within the states/counties.
- (b) **Contracted Workers.** People engaged through third parties to perform work related to core functions of the project, regardless of location. Under this category are included, employees of any non-governmental implementers, including international or national NGOs, CSOs or contractors, or Independent Verification Agents.
- (c) **UN staff and consultants.** This category includes all personnel working on the project that is contracted by UN agencies and entities, including as staff or consultants.
- (d) **Primary Supply Workers.** People engaged by the Government's primary suppliers. These include, for example, suppliers of road rehabilitation materials like gravel or other goods required.
- (e) **Community Workers.** People employed or engaged in providing community-based project interventions. These will include community members who will be working in minor road or other infrastructure works.

The LMP will apply to project workers including fulltime, part-time, temporary and seasonal. The project scope does not have chances of employing migrant workers.

Labor Forecast

Below is a forecast of the types of workers required per Project component. The numbers of required workers are currently not available.

Component 1: Provision of immediate basic services and livelihood support

Component 1 will require Direct Workers for management and coordination of activities; UN-contracted personnel for locust control, cash-for-work and livestock-related activities; and primary supply workers for potential goods required.

Component 2: Enabling medium-term flood recovery and resilience-building

Component 2 will require Direct Workers for management and coordination of activities; contracted workers for significant parts of the construction of infrastructure; primary supply workers for goods required for the infrastructure; and community workers for light community infrastructure construction activities.

Component 3: Supporting longer-term disaster risk management and preparedness

Component 3 will require Direct Workers for management and coordination of activities as well as for policy, planning and research activities; contracted workers for structural interventions in regards to integrated flood-drought preparedness ; primary supply workers for the structural interventions in regards to integrated flood-drought preparedness as well as equipping an Emergency Operations Center.

Component 4: Project Management

Component 4 requires Direct Workers for management and coordination of activities; UN-contracted workers for support to the PIU; contracted workers for the implementation of the GBV referral pathways, GRM and IVA and technical consultancies.

Component 5: Health Contingent Emergency Response for Epidemics:

Component 5 requires Direct Workers for management and coordination of activities; possible UN-contracted workers (UNICEF and WHO) for the implementation of health-related activities; contracted workers setting up and implementing health services; primary supply workers for health supplies and establishments of health centers.

Component 6: Anticipatory and Recovery Support for Addressing Food Insecurity

Component 6 requires Direct Workers for management and coordination of activities; contracted workers for construction of infrastructure; primary supply workers for goods required fro infrastructure, and community workers for light infrastructure work.

The labor requirements of the SCRP show that the LMP will have to cater for all five categories of project workers as described in ESS2, namely direct workers, contracted workers, primary supply workers and community workers. However, UN staff and consultants will be subject to UN regulations, expressed in ILO conventions and specific regulations of each UN agency or entity. It is anticipated that UN involvement in the project includes FAO, UNOPS, UNICEF and WHO. Each agency will follow its internal regulations, while fully complying with national laws where applicable, with World Bank ESS2 and with ILO standards.

Legal Framework

National Legal Framework

Provisional Constitution of the Federal Republic of Somalia.

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. The Puntland Sexual Offences Act 2016 prohibits sexual harassment. Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labor offences. Every labor law shall comply with gender equality.

Article 24.5 stipulated that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place

The Labour Code of 1972¹⁹⁸ stipulates that all contract of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.

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

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

Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.

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

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

International Conventions Signed and Ratified by Somalia

¹⁹⁸ The Code has recently been revised, but the revisions have not yet been passed and signed into law.

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

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

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

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

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

World Bank Environmental and Social Standards (ESS)

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

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 in accordance with ESS2. ESS2 requires also a grievance redress system which allows workers to raise their grievances.

Legal Gap Analysis: Labor and Working Conditions			
The Objectives of ESS 2 are: To promote safety and health at work. To promote the fair treatment, non-discrimination and equal opportunity of project workers. To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. To prevent the use of all forms of forced labor and child labor. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. To provide project workers with accessible means to raise workplace concerns.	<p><u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose.</p> <p>Article 24.5 stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place</p> <p>The Puntland Sexual Offences Act 2016 prohibits sexual harassment.</p> <p>Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labour offences. Every labour law shall comply with gender equality. Dismissal for pregnancy. All women have a special right of protection from discrimination.</p> <p><u>The Labour Code of 1972</u> stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.</p> <p><u>The Labour Code of 1972.</u> The employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the</p>	<p>The new labor code, amending the code from 1972, has not been passed yet</p> <p>The implementation of the existing articles in practice may not be very strong</p> <p>A decree in Somaliland and legislation in Puntland prohibiting FGM have been drafted.</p> <p>n/a</p> <p>n/a</p>	<p>The Project will not allow any forced and child labor. It will hold all contractors liable to the implementation of the LMP</p> <p>The PIU will have overall responsibility to monitor the implementation of the LMP</p> <p>The LMP spells out a workers' grievance redress mechanism; and the GBV Action Plan provides referral pathways for cases of GBV (see annex 4)</p> <p>The Project will fully comply with WB ESS 2. This is set out in the LMP (see annex 6)</p> <p>The Project will apply occupational health and safety management system that is</p>

	<p>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</p>		consistent with the WBG General Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety
	<p><u>The Labour Code of 1972.</u> Workers have the right to submit complaints and the employer must give the complaints due consideration.</p>	n/a	The LMP sets out a workers' grievance redress mechanism
	<p><u>The Labour Code of 1972.</u> Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.</p>	<p>Women are restricted from being employed in night work, and the specific types of work prohibited for women may be prescribed by decree.</p> <p>No provisions on the protection of the rights of domestic workers</p>	The Project will fully comply with the national law and WB ESS 2. This is set out in the LMP (see annex 6)
	<p><u>The Labour Code of 1972.</u> 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.</p>	n/a	The Project will only allow deployment from the age of 15 (see LMP). However, children under 18 are not to be considered for hazardous work and the work cannot interfere with their education or be harmful for their health.
	<p><u>The Labour Code of 1972.</u> The Labor Code forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children.</p>	<p>Children are deployed in worst forms of child labor (forced recruitment by army, forced labor in domestic work, agriculture and herding, breaking rocks for gravel, construction work, commercial sexual exploitations)</p> <p>However, Somalia made efforts to construct a</p>	The Project will only allow deployment – in all project worker categories – from the age of 18 (see LMP). Rigorous monitoring will ensure the application of the LMP.

		<p>rehabilitation center for former child combatants and establish a Human Trafficking and Smuggling Task Force.</p> <p>Children are further deployed in agriculture (farming, herding livestock, fishing); industry (construction, mining and quarrying); services (street work, working as maids in hotels, domestic work, voluntary recruitment of children by army); children also perform dangerous tasks in street work</p> <p>Laws do not identify hazardous occupations or activities prohibited for children, and child trafficking for labor and commercial sexual exploitation is not criminally prohibited.</p> <p>Government does not employ labor inspectors and conducts no inspections.</p>	
	<p><u>The Labour Code of 1972.</u> 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.</p>	<p>n/a</p>	<p>The project will follow national law and ESS 2.</p>

Labor Risk Assessment

As part of the labor risks and impacts identification, the following activities will assist in understanding the exposure pathways. Presented here are only key risks related to workers of predictable activities:

- (a) The main activities for community workers will be light works construction and rehabilitation of water supply, sanitation facilities, community roads, health facilities, and educational facilities.
- (b) The main types of activities for contracted workers will be activities in the construction and rehabilitation of water supply, sanitation facilities, community roads, health facilities, and educational facilities - including more complicated civil works (heavy equipment).

The table highlights and analyses the potential labor related risks and impacts in view of the anticipated labor utilization and general baseline settings of the project area.

Table: Labor Risk Identification and Analysis

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
ESS2: Labour and working conditions		
Labor standards are not in accordance to national laws and international standards	The new labor code, amending the code from 1972, has not been passed yet The implementation of the existing articles in practice may not be very strong	Through the implementation of this LMP the gaps are addressed
Underpayment of contracted workers or supply workers	Since Somalia has no statutory minimum wage, there is a risk that local contractors and sub-contractor underpay the contracted or supply workers. The Labour Code from 1972 stipulates that remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.	The Project will decide on a minimum wage (categorized by type of task) and implement it throughout the project / cascade it down to contractors
Poor working conditions: unsafe work environment	Due to the protracted conflict in Somalia and the weakness of formal justice institutions, employees' working conditions are poor and the Project needs to ensure that such working conditions are not acceptable. The impact is significant in that it may manifest in exploitation of the very community that the Project intends to benefit, ie community workers, but also contracted workers may be affected.	Supervision of Contractor Labor Management Practices is essential to mitigate against this risk. A Contractor checklist in annex 5 will be used. The Project will ensure through rigorous workers' grievance mechanisms that workers can articulate violations of their rights and receive redress.
Poor working conditions: violation of workers' rights	Labor laws in Somalia are outdated, amendments to the Labor Code from 1972 have not been passed yet. There is also the risk of lack of enforcement given the weak justice and enforcement structures in place.	The Project will ensure through rigorous workers' grievance mechanisms that workers can articulate violations of their rights and receive redress.
Discrimination against women in employment	If there is no deliberate effort by the project to encourage the local women to thrive for contracted work or community work, the risk of missing them as beneficiaries of potential employment is substantial.	Contractors are compelled to safeguard the interests of women, including gender parity at the workspace, appropriate sanitation facilities at workplace and appropriate PPE for women. Implementation of code of conducts to be signed by project workers and enforced by all contractors
Use of child labour	The Labor Code forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children. Children are deployed in agriculture (farming, herding livestock, fishing); industry (construction, mining and quarrying); services (street work, working as maids in hotels, domestic work, voluntary recruitment of children by army); children also perform dangerous tasks in street work	The Project will only allow deployment- in all project worker categories – from the age of 15. However, children under the age of 18 will not be allowed to perform hazardous work, nor is their work allowed to interfere with their education or have any negative impact on their health. Rigorous monitoring will ensure the application of the LMP. The project will require the implementation of age verification procedures by contractors for all its prospective employees

	<p>Laws do not identify hazardous occupations or activities prohibited for children, and child trafficking for labor and commercial sexual exploitation is not criminally prohibited.</p> <p>Government does not employ labor inspectors and conducts no inspections.</p>	
Worst forms of child labour	<p>Children are deployed in worst forms of child labor (forced recruitment by army, forced labor in domestic work, agriculture and herding, breaking rocks for gravel, construction work, commercial sexual exploitations)</p> <p>However, Somalia made efforts to construct a rehabilitation center for former child combatants and establish a Human Trafficking and Smuggling Task Force.</p>	<p>The Project will only allow deployment – in all project worker categories – from the age of 15. However, children under the age of 18 will not be allowed to perform hazardous work, nor is their work allowed to interfere with their education or have any negative impact on their health. Rigorous monitoring will ensure the application of the LMP.</p> <p>The project will require the implementation of age verification procedures by contractors for all its prospective employees</p>
Injuries at the workplace	<p><u>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</u></p> <p>However, PPE may be scarce for contracted workers or community workers, and health and safety regulations may not exist or not be enforced.</p>	<p>Contractor occupational risk assessments and mitigation plans will be devised and implemented.</p> <p>Implementation of OHS Plan</p>
ESS4: Community Safety and Health		
Labour influx and GBV	<p>There is likely to be internal movement of people from areas outside the project areas to seek employment and associated benefits from within targeted communities. Furthermore, contracted workers may be brought into communities to conduct construction works. Population movement due to labor influx may result in GBV/SEA cases.</p>	<p>All contractors will implement the Labour Influx Management Procedure (see below); a GBV/SEA Action Plan will be implemented (see annex 4)</p> <p>Implementation of code of conducts to be signed by project workers and enforced by all contractors</p>
Spread of diseases in communities, including HIV through labor influx	<p>Population movement due to labor influx may result in the spread of HIV and other diseases.</p>	<p>All contractors will implement the Labour Influx Management Procedure (see below), including sensitization on preventing common diseases. Communication of risks will be conducted through locally appropriate means – targeting specific social groups and genders.</p> <p>Implementation of code of conducts to be signed by project workers and enforced by all contractors</p>

Contamination of drinking water supplies, ambient air quality and general nuisance from septic tanks and pit latrines.	The siting and operation of the latrines may create potential for contamination of the water supply, ambient air and create diseases vector.	Location of such facilities should be downstream or minimum 30 meters of water sources, direction of wind, cleanliness within the facilities and hand washing observance.
Risk of Insecurity	There is a persistent risk of insecurity for project workers given the conflict situation in Somalia, including the existence of armed groups and threats posed by Al Shabaab.	The Project will implement a Security Management Plan (SMP), which will account for all Project workers and project-affected parties.

Institutional Arrangement for Implementation of LMP

Given the categories of project workers (direct workers, UN-contracted workers, contracted workers, primary supply workers and community workers), this section lays out the operational arrangements amongst the various institutions that are collaborating in the SCRP and ensure the smooth implementation of the LMP. The requirements of the LMP apply to all categories of Project Workers and where there is a special emphasis for a particular category of workers, this will be highlighted within the applicable section of the LMP.

Direct Workers are those workers employed directly by the Government specifically for the SCRP. The requirements of the LMP as applicable to the direct workers will be under the responsibilities of the Government through the PIU. The PIU will have an oversight role on other Government entities through direct reporting arrangement on the requirements of the LMP in particular and other ESMF requirements in general.

UN-Contracted Workers are those workers on UN contracts, including staff and consultants. These personnel will be under the direct control and management of the respective UN agency or entity, in compliance with UN Human Resource guidelines. However, no actions of the UN can be in contradiction with this LMP. Violations should be reported to the PIU and the World Bank.

Contracted workers are those workers that will be employed by international and national NGOs, CSOs and contracting companies to execute the project activities on the ground, including Third Party Monitors. All organizations or companies have the responsibility to ensure LMP implementation while the PIU oversees the LMP implementation at all levels.

The Primary Suppliers are identified by the Government or international and national NGOs, CSOs and contracting companies. The applicability of the LMP will be affirmed at the time of selection. The PIU has the mandate to ensure that all the procedures for primary supply workers are observed, and it also has the overall responsibility for this. ESS2 applies a proportionality approach to oversight responsibility towards suppliers. That being said it is important that the project ensures minimum conditions in any activities ongoing within construction sites.

Community workers may be deployed by the Government directly or through international and national NGOs, CSOs and contractors to conduct light construction works. All entities are therefore responsible for the full implementation of the requirements of the LMP as it applies to community workers, while the PIU will exercise oversight over labor management processes.

The approach to the implementation of this LMP is that all the provisions of the LMP are applied to all project workers and where special mention for a particular category of project worker is required, it will be mentioned.

Staffing to Implement and Monitor LMP

As the implementation of Component activities approved by the PSC at the federal level are led by the PIU, located in the MoF, the PIU will carry the main responsibility for the implementation and monitoring of the LMP.

FMS MDAs will identify sub-project interventions under the investment plans and prepare subproject designs and bidding documents in consultation with FGS MDAs, as well as support the procurement of contractors. FMS MDAs will also be responsible for contractor and site supervision, technical quality

assurance, certification, and payment of works. The FMS MDAs will hereby receive support from the PIU to ensure labor management procedures are integrated into the procurement of contracts / bidding processes.

Implementing Partners (IPs) will be contracted by the PIU and/or MDAs to lead the detailed design of the sub-projects or activities, mainly in Component 2, including engineering design for some works. The PIU will be responsible to assist with the E&S screening process where necessary and to approve screening results and subsequent E&S plans, and to monitor and supervise the implementation of all E&S risk mitigation measures.

The PIU will be responsible to assist with the E&S screening process where necessary and to approve screening results and subsequent E&S plans, and to monitor and supervise the implementation of all E&S risk mitigation measures, including those laid out in the LMP.

The monitoring and supervision of the implementation of the LMP will rest with the Social Specialist in the PIU, who is part of the PIU's Risk Management Team. The Specialist will have at least 8 years of experience in the implementation of social safeguards. The Social Specialist will continuously analyze labor-related risks related to the project; overseeing of all partners' implementation of the LMP, and the monitoring of the same. The overall responsibility for the implementation of all E&S instruments lies with the Project Coordinator of the PIU.

The PIU will be reinforced by UNOPS that will provide support to implementation of the LMP, as well as the monitoring, supervision and reporting of the implementation of the LMP, among other E&S instruments. UNOPS will thereby act in an advisory function to the PIU, and will assist with capacity development for the PIU staff and all relevant project implementation partners (PSC, PIU, SPTs, MDAs, CSOs) in regards to the implementation of the LMP. UNOPS will not have decision making powers, including over sanctions for non-compliance.

This will be part of UNOPS assistance in intensive project management support in the first year to build the capacity of the PIU and then gradually phase out over the lifetime of the project. UNOPS shall be expected to provide the PIU with intensive 'on the job' training during the first phase of the project.

All IPs receiving funding for project implementation must demonstrate sufficient capacity among its staff in order to design and implement the necessary labor management measures. The PIU will approve demonstrated staffing capacity of the respective IP, together with approval of general project activities.

The capacity of the government institutions involved in the project in view of the implementation of the World Bank's ESF is low, and there may be difficulties in building cooperation and coordination across different levels. Furthermore, there are limited policy and regulatory frameworks for the management of social and environmental risks, especially in the labor field. Legislation on labor issues in Somalia is outdated and has not been replaced yet. It is for that reason that the Project will mainly follow the World Bank ESF. The PIU will adopt a policy that commits to implementing the World Bank ESS. It will further ensure that all its staff work in support of this policy and have sounds understanding of it through training and capacity building measures.

Key Procedures

The SCRP is guided by the recognition of the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. The SCRP will promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

Key Procedures Rationale

The Somali Government, the UN agencies and entities, international and national NGOs and CSOs as well as contractors and all project workers will follow in ensuring the full accomplishment of the objectives of ESS2 and ESS4 in specific. For ease of reference, all employers will be referred to as 'contractors'. This will exclude UN agencies and entities.

During the gap assessment, there are some aspects that are completely covered through legislation while aspects not completely covered by legislation will be satisfied through reference to the World Bank's sector specific guidelines on good practices on occupational safety and health.

Recruitment and Replacement Procedure

Procedure Objective

The objective of this procedure is to ensure that the recruitment process and placement of direct and contracted workers (see procedure below for community workers) is conducted in a manner which is non-discriminatory and employees are inducted to all essential work-related matters.

Procedure

1. Hiring entity submits a recruitment plan to the PIU for review and approval. The following details will be shown;
 - i. Number of staff required
 - ii. Intended working condition
 - iii. Intended locations of staff
 - iv. Job specifications in terms of qualification and experience
2. Hiring entity publishes the job invitation in the appropriate media (local press or direct invitation for contracted worker, or word of mouth through local leaders for community workers) to ensure all potential candidates have access to the information, including women, actively addressing risks of nepotism.
3. Shortlist and recruit candidates ensuring the following;
 - i. As much as possible, 50% shortlisted candidates are women.
 - ii. As much as possible, 50% engaged employees are women.
 - iii. Screen off candidates under the age of fifteen years.
4. On recruitment, ensure a contract of employment is signed voluntarily, for both direct and contracted workers.
5. Before commencement of work, hiring entity will ensure employee is inducted on the essential work related issues as listed in appendix B, which include the following;
 - i. Key Job Specifications
 - ii. Terms and Conditions of Employment
 - iii. Special Codes of Conduct
 - iv. Disciplinary Procedures
 - v. Workers' Grievance Mechanism
 - vi. Freedom to join and participate fully in Workers Association activities or Trade Union
 - vii. Key Environmental and Social aspects of the SCRP and the ESMF
 - viii. Emergency Preparedness

6. Maintain all such employment records available for review by the PIU, the World Bank, or Regulatory Authority.

Workers' Grievance Redress Procedure

a. Objectives of the procedure

The objective of this procedure is to settle the grievance between employer and employee or between employees bilaterally before the intervention of the formal court, except in cases where the grievance constitutes a criminal offense that requires notification of the law enforcement agencies.

b. Procedure

1. All contractors and the UN only to contract sub- contractors with registered code of conduct or who sign an undertaking to comply with the provisions of the Labor Act for contracted workers and contractors who will comply with community meetings resolutions on applicable rules in the case of community workers.
2. Contractors induct the employee on the applicable workers' grievance redress mechanism. Induct all project workers to be aware of their rights. All records of induction shall be kept and made available for inspection by the PIU or the World Bank.
3. In case of violation, the aggrieved employee must capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest.
4. The supervisor will verify the details and seek to address the matter within the shortest time up to 48 hours.
5. The supervisor will escalate the matter if not resolved within 48 hours until a resolution is found or not found.
6. Where no resolution is found, the employee can escalate the matter to the sector specific institutions or courts who will resolve the matter between employer and employee. The Supreme Court's decision is final.
7. Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to and handled by the PIU, for example through the Project Grievance Redress Mechanism (GRM). The PIU, in this case, will accommodate a fair agreement between the worker and the contractor.
8. The Contractor shall keep records of all proceedings of grievance redress that are within its jurisdiction and furnish the PIU as part of the periodic progress reporting to the PIU.
9. All grievances of sexual nature (GBV/sexual harassment/Sexual Exploitation and Abuse) should follow the SCRP GBV/SEA Action Plan referral pathways and complaints resolution mechanism.
10. In case of risk of retribution, the employee may immediately escalate to the court system [6] or to the PIU as noted under [7]. If confidentiality is requested, the PIU will ensure it to avoid any risk of retribution, including in its follow-up actions.

Occupational Health and Safety Procedures

a. Objective of Procedure

The objective of the procedure is to achieve and maintain a healthy and safe work environment for all project workers (contracted workers and community workers) and the host community.

b. Procedure

1. On procurement for contractors, the PIU will avail the ESMF to the aspiring contractors so that contractors include the budgetary requirements for occupational health and safety and community health and safety measures in their respective bids.

2. The contractor will develop and maintain an occupational health and safety management system that is consistent with the scope of work, duration of contract and IFC General Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety which can be found at <http://www.ifc.org/wps/wcm/connect/9aef2880488559a983acd36a6515bb18/2%2BOccupational%2BHealth%2Band%2BSafety.pdf>.
3. Contractor will adopt the sub-project ESMPs and where necessary develop Construction Environmental and Social Management Plans (C-ESMPs) to help manage construction risks.
4. Contractor appoints an appropriately qualified and experienced Safety Health and Environmental Officer whose responsibilities is to advise the employer on Health and Safety related issues.
5. Contractor prepares task specific risk assessment (TRA) and safe working procedures (SWP) for executing works;
6. Contractor provides preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances informed by TRA and SWP.
7. Contractor provides for appropriate training/induction of project workers and maintenance of training records on occupational health and safety subjects including TRA and SWP.
8. Contractor documents and reports on occupational accidents, diseases and incidents.
9. Contractor provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited to;
 - Workplace accidents
 - Workplace illnesses
 - Flooding
 - Fire outbreak
 - Disease outbreak
 - Labor unrest and
 - Security
10. Contractors to comply with all requirements of applicable occupational Health and Safety legislation and Environmental legislation including WB EHS guidelines.
11. Contractors shall maintain all such record for activities related to the safety health and environmental management for inspection by the PIU or The World Bank.

Contractor Management Procedures

a. Objective of Procedure

The objective of this procedure is to ensure that the PIU has contractual power to administer oversight and action against contractor noncompliance with the LMP.

b. Procedure

- i. The PIU shall avail all related documentation to inform the contractor about their requirements for effective implementation of the LMP.
- ii. Before submitting a bid for any contract, the contractor shall incorporate the requirements of ESMF and the LMP as listed in appendix C.
- iii. Contractor to formulate, implement and review contractor specific Management Plans (C-ESMPs) as required by the ESMF and specifically the LMP including
 - Occupational health and safety plans
 - Labor Recruitment Plan
 - Code and Conduct for employees

- Waste management plan
 - Emergency plan
- iv. Contractor to submit the progress reports on the implementation of the LMP and allow the PIU access to verify the soundness of the contractor's implementation of the requirements of the LMP.
- v. Where appropriate, the PIU may withhold contractor's payment until corrective action(s) is/are implemented on major noncompliance to the LMP. The following are some of the major noncompliance that contractors need to take note of (Comprehensive list is in appendix C);
 - Failure to submit mandatory quarterly progress report
 - Failure to avail for inspection specified documentation pertaining to the implementation of the ESMP, C-ESMP and LMP
 - Failure to timely notify and submit incident and accident investigation report
 - Failure to appoint or replace a competent and experienced EHS officer
 - Failing to enforce C-ESMPs including provision of adequate appropriate PPE
 - Recruitment of nontechnical staff from outside the local community.

Labor Influx Procedure

a. Objective of the Procedure

The objective of this procedure is to capacitate the PIU all implementers and contractors to mitigate the labor influx risk and impacts. The influx of workers and followers can lead to adverse social and environmental impacts on local communities, especially if the communities are rural, remote or small. Such adverse impacts may include increased demand and competition for local social and health services, as well as for goods and services, which can lead to price hikes and crowding out of local consumers, increased volume of traffic and higher risk of accidents, social conflicts within and between communities, increased risk of spread of communicable diseases, and increased rates of illicit behavior and crime, including GBV cases.

b. Procedure

- i. Contractor shall ensure that all non-technical work is reserved for locals (identifiable with the host community and witnessed by host community leadership)
- ii. Beneficiary selection and employment recruitment should verify the authenticity of the localness of potential employees.
- iii. Contractor liaises with local leadership on enrolment for community workers while at the same time ensuring that no grievances derive from nepotism via utmost transparency in the selection process, announcing hiring campaigns early enough in community consultations and/or other outreach activities.
- iv. Where there are camp establishments, Contractor shall ensure camp management and community relations are good. If labor camps are required, special management plans need to be developed, or if smaller establishment, camp management reflected in the ESMP.
 - Security within camp
 - Social relations with community members should be cordial and consistent with GBV and SEA
 - Waste management
 - Water and sanitation
 - Proper camp demobilization
- v. Establish code of conduct for contracted workers' interaction with the host community. This may include;
 - Access to camp by children, non-employed girls and women

- Appropriate language
- Time restrictions where required
- GBV/SEA
- Good conduct if small numbers of workers are accommodated in communities rather than camps (requirements on when to establish a camp shall be included in the POM)
- vi. Contractors should have own supply of, pay for accommodation offered by community to contracted employees.
- vii. Contractor shall ensure that local supply shall not negatively impact the availability of resources for the local communities and sourcing of local wildlife shall be prohibited.
- viii. Contractor shall provide a fully equipped first aid kit.
- ix. Contractors to mainstream HIV issues in the workplace by providing HIV prevention training during induction and continuously during employment through health and safety talks.
- x. Contractor to have, be fully aware of and be ready to implement the Workers' Grievance Redress Mechanism since they are the face of the Project on the ground.

Procedure for Primary Suppliers

Primary supply workers are employees of suppliers who on an ongoing basis, provide goods and services to the Project. Although suppliers may be sub-contracted by other implementers, the PIU has oversight on the implementation of the LMP requirements in this category.

Objective of the Procedure

The objective of the procedure is to ensure that labor related risks, especially child and forced labor as well as serious safety issues to the Project from primary supply workers are managed in line with the requirements of ESS2.

Procedure

The PIU and all contractors/implementers will undertake the following measures

- i. Procure supplies from legally constituted supplier. The legal registration ensures that the company is legally obliged to comply with all applicable labor laws in Somalia, which makes it possible to assume mainstreaming of the labor laws within the supplier's firm. This will include ensure evidence of
 - Certificate of incorporation
- ii. Make a physical check on the supplier's labor management system, including
 - occupational safety and health
 - any past work related environmental or occupational incidents
 - Age restrictions (18 and above)
 - employment is voluntary

Procedure for Community Workers

Some activities will include the use of community workers in a number of circumstances, such as labor provided by the community in construction or rehabilitation activities. In these scenarios of community workers, the related occupational risks are perceived as low since they will be using simple tools and perform light work. Given the nature and objectives of such Project, the application of all requirements of ESS2 may not always be applicable. In all such circumstances, this Procedure provides measures to be implemented to ascertain whether such labor is or will be provided on a voluntary basis as an outcome of individual or community agreement and if the employment terms and conditions have been fully discussed and agreed.

Objective of Procedure

The objective of this procedure is to ensure the community workers offer their labor voluntarily and is agreeable to the terms and conditions of employment.

Procedure

The PIU and all contractors/implementers using community workers will apply the following guidelines when dealing with community workers. The PIU will develop standard TOR, working times, remuneration systems (depending on the type of work), methods of payment, timing of payment, and community CoC, which will apply to all project activities. These will be developed during the Project inception phase.

i. Produce a recruitment plan and have it reviewed and approved by the PIU
ii. Meet and document resolution of meeting with community on the intended community workers recruitment. The resolution shall include details on

- Nature of work
- Working times
- Age restrictions (15 and above for non-hazardous work; 18 for hazardous work)
- Remuneration amount
- Method of payment
- Timing of payment
- Individual signatory or representative signatory of meeting resolution
- Employment is voluntary
- Community CoC

iv. Contractor will have the terms and conditions discussed, explained, negotiated and documented through joint community meetings, with each community employee showing consent through appending of their signature against the resolutions or signing the attendance register of the meeting which made the employment resolutions.

v. Induct community workers on key LMP issues, including

- GBV and SEA
- Workers' and Project GRM
- Occupational Safety and Health
- HIV awareness
- Safe use of equipment and lifting techniques
- Applicable PPE

Procedure for Non-Discrimination and Equal Opportunity

In accordance with ESS 2, this procedure ensures that decisions relating to the employment or treatment of Project workers will not be made on the basis of personal characteristics. It will be based on the principle of equal opportunity and fair treatment.

Objective of Procedure

The objective of this procedure is to ensure that recruitment and treatment of Project workers is based on the principle of equal opportunity and fair treatment.

Procedure

The PIU and all contractors/implementers will apply the following guidelines when dealing with workers.

i. 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

ii. harassment, intimidation and/or exploitation will be prevented or addressed appropriately

iii. Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination.

iv. vulnerable Project workers will be provided with special protection, these include:

- Women;
- People with disabilities;
- IDPs.

Annex 7: General Quarterly and Annual E&S Reporting Format

This annex provides a sample quarterly E&S Reporting Format. However, since the project includes a wide variety of thematic activities, the PIU will provide specific E&S Quarterly Reporting Templates, which are tailored to the type of activities of each IP.

Summary of Key E&S Aspects during the Reporting Period

Project Status, E&S Incidents, E&S Changes, E&S Initiatives

Project Status

Provide a brief description of any new developments in relation to operations and facilities over the reporting period.

E&S Incidents

Please provide a summary of all the notifiable E&S incidents, per CTA definitions.

Please expand or collapse the table where needed.

Date	Incident description	Class	Reports sent to lenders	Corrective actions / Remedial plan

E&S Changes

Please provide a summary of all the notifiable E&S changes.

Please expand or collapse the table where needed.

Date	Change description	Reports sent to lenders	Implementation status

Improvements/initiatives regarding E&S performance

Briefly describe improvements/initiatives implemented during the reporting period on management of E&S aspects (e.g. energy/water savings, sustainability reports, waste minimization, etc.)

ESS1: Assessment and Management of Environmental and Social Risks and Impacts

E&S Impact / Risk Assessment

Have any supplemental environmental, social, health and safety impact/risk studies been conducted during the reporting period? (Please provide copies)

Compliance with Environmental and Social Management Plans

The status of the ESMP implementation should be described and any issues that remain outstanding should be detailed.

ESS2. Labor and Working Conditions

Human Resources Management

Have implementers and contractors changed/updated their Human Resource (HR) policy and procedures, HR manual, and Health & Safety procedures, during the reporting period?

Yes

No

If yes, please provide details.

	# community workers	# direct workers	# Female direct workers	Turnover	# Contracted workers ¹⁹⁹
Previous year					
Reporting year					

Provide the following information regarding the workforce:

List the worker-related court cases and describe their status.

Occupational Health and Safety

Describe the main changes implemented in terms of Occupational Health and Safety (OHS) during the reporting period, e.g. revision of the OHS management procedures, action plans for technical improvements, leading/lagging indicators used/introduced, identification of hazards, new controls, etc.

Please attach Health & Safety audit reports available for the reporting period.

Copies attached with this report Copies available upon request Not Available

Accident Statistics Monitoring

Report TOTAL numbers for each parameter	This reporting period			Last reporting period (not cumulative) ²⁰⁰		
	Community workers	Direct workers	Contracted workers	Community workers	Direct workers	Contracted workers
Total number of workers						
Total man- hours worked - annual						
Total number of lost time						

¹⁹⁹ See ESS2 definitions.

²⁰⁰ To be provided after the project has been operational for at least two consecutive years.

occupational injuries ²⁰¹						
Total number of lost workdays ²⁰² due to injuries						
Lost time injury frequency ²⁰³						
Fatalities						
Vehicle collisions ²⁰⁴						

Provide details for the non-fatal lost time injuries during this reporting period.

UNOPS/IOM / contractor/ Subcontractor employees?	Total workdays lost	Description of injury	Cause of accident	Corrective measures to prevent reoccurrence

Provide details for fatal accidents during this reporting period, if any, (and provide copies of accident investigation and respective corrective plan).

Date of Accident	Type of Accident	Description of Accident	# Fatalities	Preventive measures taken after the incident

OHS Training

Describe Health and Safety training programs carried out in the reporting period.

Workplace Monitoring

Please provide copy of any Workplace Monitoring reports developed for the reporting period.

ESS3. Resource Efficiency and Pollution Prevention

²⁰¹A *lost-time injury* (LTIs) is the incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

²⁰²*Lost workdays* are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

²⁰³ The number of *lost time injuries* (LTIs) recorded for Project workers per million man-hours worked by them. LTI Frequency Rate = injuries per million hours worked = # of lost time accidents x 1,000,000 hours / total man-hours worked).

²⁰⁴ Vehicle Collision: When a vehicle (device used to transport people or things) collides (comes together with violent force) with another vehicle or inanimate or animate object(s) and results in injury (other than the need for First Aid) or death.

Environmental Monitoring

Provide copy of environmental monitoring data reports for this reporting period, collected consistent with the ESMPs for the sub-projects.

Briefly describe environmental mitigation measures implemented during the reporting period to comply with E&S requirements.

Resources Efficiency: Energy and Water

Provide data on energy and water consumption during the reporting period. If the data requested are available in another format, they can be submitted instead.

Describe the Concessionaires' resources efficiency measures/efforts being implemented to minimize fuel, energy, and water consumption.

Hazardous and non-Hazardous Waste²⁰⁵

Erosion Control, Slope Stability and Reinstatement

Please describe status and actions implemented in terms of erosion control, slope stability, and reinstatement within the project's footprint and area of influence.

ESS4 Community Health, Safety and Security

Community Health and Safety

Please list and describe any initiatives implemented in relation to community health and safety during the reporting period.

Please provide the list and description of the actions, the expected or actual dates of implementation, progress/status, results obtained. You can use a tabular format (as below) or provide the information as an attachment of the report.

During the reporting period, have any emergency drills been conducted with participation of the local authorities, public emergency organizations, local communities? Are the communities aware of the emergency response plans?

Accident Reporting

Provide details for the non-fatal casualties, involving third parties, during this reporting period.

Date of Accident	Type of Accident	Description of Accident	# of People Injured	Preventive measures taken after the incident

Provide details for fatal accidents during this reporting period (and provide copies of accident investigation and respective corrective plan).

Date of Accident	Type of Accident	Description of Accident	# of Fatalities	Preventive measures taken after the incident

²⁰⁵ Waste types include but are not limited to: chemical containers, chemical sludge, containers/pallets, dewatered sludge, domestic waste, ferrous and non-ferrous scrap, hospital waste, laboratory waste, liquids, off-specification raw materials, paint waste, sludge, solids, truck and auto tires, waste fuel hydrocarbons, waste hydraulic fluids, waste lubricating hydrocarbons, waste solvents, waste treatment sludge, contaminated soil, creosote sleepers, etc.

GBV/SEA Action Plan

- Please provide an update on the status and progress of the actions as defined in the GBV/SEA Action Plan. You may attach relevant monitoring reports.

ESS5 Land Acquisition and Involuntary Resettlement

Report any activities that have been required involuntary resettlement

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Biodiversity Management

Please report on the mitigation measures included in the ESMF and ESMPs

As needed, using the table below describe any **new activities or expansions** that have increased the project footprint into new **areas of habitat** during the reporting period.

New activity/expansion	Total area covered	Habitat type

ESS8 Cultural Heritage

Report if chance find procedures have been applied if not, please indicate Not Relevant.

ESS 10 Stakeholder Engagement and Information Disclosure

Stakeholder Engagement, Public Consultation and Disclosure

List any stakeholder engagement events, including public hearing, consultation and disclosure, liaison with non-governmental organizations, civil society, local communities on E&S.

Date	Participant(s)	Formats of Interaction	Issues Discussed	UNOPS response/Agreement reached (attach minutes if any)	Actions Taken (if any)/ Remarks

Grievance Mechanism and Court Cases

Report the number and type of requests and/or grievances received from project affected people / local communities / local organizations

How many have been resolved and how many are pending? (Please attach a log of the grievance redress registry.

Report the number and type of court cases on E&S grounds, if any (Please attach a log of all court cases and their status)

ANNEX 8: World Bank Incident Classification Guide

Indicative
<ul style="list-style-type: none">• Relatively minor and small-scale localized incident that negatively impacts a small geographical areas or small number of people• Does not result in significant or irreparable harm• Failure to implement agreed E&S measures with limited immediate impacts
Serious
<ul style="list-style-type: none">• An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources• Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents• Failure to remedy Indicative non-compliance that may potentially cause significant impacts• Is complex and/or costly to reverse• May result in some level of lasting damage or injury• Requires an urgent response• Could pose a significant reputational risk for the Bank.
Severe
<ul style="list-style-type: none">• Any fatality• Incidents that caused or may cause great harm to the environment, workers, communities, or natural or cultural resources• Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed• Failure to remedy Serious non-compliance that may potentially cause severe impacts is complex and/or costly to reverse• May result in high levels of lasting damage or injury• Requires an urgent and immediate response• Poses a significant reputational risk to the Bank.

Annex 9: Incident Reporting Guidance

An incident report should contain the following information:

Incident Report Form

Please report any incident within 24 hours to the PIU

Implementing Partner	
Subproject / Activity	
Report Date	
Reported By (Name and Title)	

i. Details of Incident

Incident Date	
Incident Time	
Incident Place	

ii. Identification of Type of Incident and Immediate Cause

1. Select the type of the incident from the list below. An incident can be classified at the same time as H&S/environmental/social.

Type of Incident: (and incident can cover more than one type):

Type of Incident – Health & Safety		Type of Incident – Social	Type of Incident - Environmental
Moving Machinery/vehicles at project site	Dust, Fumes, Vapours that impact the population and/or environment	Misuse of property	Chemical/Oil Spill with impact on population and/or environment
Powered Hand tools	Noise	Damage to Cultural Heritage	Improper Disposal Waste
Hand Tools	Temperature or heat	Occurrence of infringement of labor rights	Disasters (Earthquake, Flood, etc)
Animals or insects	Overexertion	Occurrence of infringement of human rights	Water Pollution/ Sedimentation
Fire or Explosion at project site	Structural Failure	Strike, demonstration	Damage to ecosystems (e.g. damage to flora/fauna)
Trips & smaller falls	Chemical/biological	Other (please specify)	Odor air Emissions

Drowning	Stress	GBV/SEA or Child Risks	Dust, Fumes, Vapors, Air pollution with impact on population and/or environment
Borrow-pit Management	Other (please specify)		Other (please specify)

2. For each type of incident, select the relevant descriptor(s) from the list. You can select up to 5 descriptors for each type of incident. If a descriptor is not listed below, please type in short descriptor in "Other". Add more rows as necessary.

Incident Type	Descriptor 1	Descriptor 2	Descriptor 3	Descriptor 4	Descriptor 5	Other
H&S						
Social						
Environmental						

Provide a description of the immediate cause of the incident:

iii. Description of the Incident

Record all facts prior to and including the incident, if it was a planned activity, describe/list material, ecosystem and property damaged, etc:

iv. Root Cause Analysis

Select the root cause(s) of the incident from the list below. If 'Other', please specify:

Root Cause	Yes	No
Improper Planning		
Poor Maintenance		
Poor Supervision		
Poor Quality of Equipment		
No rules, standards, or procedures		
Lack of knowledge or skills		
Improper motivation or attitude		
Failure to comply with rules		
Other		

Additional Questions:

- Is the incident still ongoing or is it contained?
- Is loss of life or severe harm involved?
- What measures have been or are being implemented by the Implementer?

Annex 10 : Terms of Reference for ESIA, Outline of detailed ESMP and Sample of ESMP Checklist

Terms of Reference for ESIA

Sample TERMS OF REFERENCE (TOR) ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

I. Information and scope of the consultancy

Profile required: consultants, with specialized expertise in Environmental and Social Impact Assessment of community infrastructure projects (hereinafter referred to as the “EIA team”).

Location of works: Somalia

Duration of appointment: xxx

II. Background: xx details of activity xxx

III. Description of Work

Under the authority of the IP (name), and under the direct supervision of the state-PIU and the federal PIU the team will: Perform an analysis of the Environmental and Social Impacts of the activity and develop a management plan to avoid or mitigate the adverse impacts.

The objectives of the ESIA include:

- Source and present baseline information on the environment in the project areas, including the physical, biological and socio-economic conditions;
 - Assessment issues related to the determination of biodiversity conservation and sustainable management of living natural resources
 - Assess the overall environmental context as a baseline
 - Assessment of existing environmental / agricultural arrangements as relevant to the Project
 - Develop provisions for management of resource efficiency and pollution prevention
- Analyze and assess in detail the environmental and social impacts of the project in the areas of implementation;
 - Social assessment to better identify vulnerable groups, and social inequities
 - Conduct SGBV and Gender Equality and Social Inclusion Analysis and produce GBV Action Plan
- Identify and refine the Environmental and Social Management Frameworks (ESMF) for the mitigation of the environmental impacts
- Identify requirements to the Labor Management Plan and further Health & Safety risks and refine ESMF accordingly
- Conduct legal analysis to ensure legal requirements for the Project are fully understood and the LMP and other provisions comply with Somalia laws and World Bank ESS.
- Develop activity- or site specific ESMP.

Proposed methodology:

- Desk review of existing literature and studies

- Filed assessment
- Stakeholder consultations
- Data analysis
- Report writing (draft)
- Validation workshop
- Production of final report

Proposed scope and activities:

Activity 1 : Context of the project :

- Describe, if any, environmental planning and management already been included in the project;
- Undertake a review of policies, legislation and regulations that will affect the EIA and the environmental management of the proposed works;

Activity 2 : Description and baseline of the Environment in the project area

- Present the areas subject to the study and assessment (areas of influence of the project);
- Collect and analyze baseline data of environmental elements in the area of influence of the project. Environmental elements to be covered include but are not limited to, the following:
 - Physical elements: geology, topography, soils, climate, air quality, drainage patterns, surface water, groundwater, water quality, soil erosion, etc.
 - Biological elements: flora and fauna, habitats, rare and endangered species, protected areas and other areas classified as vulnerable, trends in fauna and flora, etc.
 - Where necessary utilizing intergrated Biodiversity Assessment Tool (IBAT) to capture relevant baseline information on ecologically sensitive areas for the ESIA phase
 - Socio-economic elements: demographic characteristics, population density, land-use, agricultural and economic activities, modes of transport, road networks and their usage, administrative structures, employment, presence and magnitude of waterborne diseases and HIV/AIDS, sites of natural or cultural value, etc.

Activity 3 : Detailed assessment of the environmental and social impacts of the project

The EIA team will identify, analyze and assess environmental impacts of the proposed works. The study will investigate in detail the potential for the following impacts arising from the proposed works (not limited to these):

Direct impacts on the environment

- Direct impact on the environment and biodiversity (e.g. destruction or defragmentation of habitats, destruction or degradation of protected or vulnerable areas, ecosystems, species, poaching, [temporary] settlements, etc)
- Direct impacts on surface water and catchment areas: water flow, erosion, water quality, etc.;
- Direct impacts on groundwater systems and quality, related to changes in surface water flows ;
- Direct impact on landscape : topography, land use, erosion, drainage, quarries, camps, etc ;
- Direct impact on natural resources : project requirements in water, wood, energy, and other resources;

- Direct pollution from the project (routine, non-routine, accidental): solid waste, toxic and hazardous waste, effluents and discharges, leakages, spills, run-off, noise and air.
- Direct impact on natural disaster risks : landslides, flooding, erosion, etc.

Indirect impacts on the Environment

- Increase in deforestation (e.g. logging, land clearing, slash and burn, etc) ;
- Increase and facilitation in forest resource exploitation (industrial and local);
- Increase in poaching and harvesting of non-timber forest products ;

Socio-economic impacts

- Impacts on health and security of the population (GBV, disease transmission, particularly HIV/AIDS and waterborne diseases, access to medical treatments, accident risk, noise and air pollution, etc.);
- Impacts on vulnerable groups
- Impacts on the local population, economic activities, creation of employment, loss of agricultural and residential lands, destruction of properties, relocation of infrastructures, threats to cultural and historical sites ;

Characteristics of the impact assessment

Environmental impacts will be analyzed in terms of the following and any other relevant characteristics:

- Positive (beneficial); Negative (adverse)
- Direct, indirect, cumulative
- Magnitude
- Spatial coverage
- Stages of the project at which they occur
- Duration (intermittent, continuous, short-term, long-term)
- Reversibility, irreversibility
- Likelihood of occurrence

Wherever possible, the above and any other impact characteristics shall be analyzed quantitatively and the cost of each impact will be indicated. The significance of impact of the proposed works will be assessed, and the basis of this assessment specified. The EIA team will take into consideration any national and international environmental standards, legislation, treaties, and conventions that may affect the significance of identified impacts. The team will use the most up-to-date data and methods of analyzing and assessing environmental impacts (considering the local context). Uncertainties concerning any impacts will be indicated.

Activity 4: Environmental Management Plan, EMP

The EIA team will suggest cost-effective measures to minimize, mitigate, or eliminate adverse impacts of the proposed works. Measures to enhance beneficial impacts will also be recommended.

The Environmental Management Plan will include, but will not be limited to, the following:

- Mitigation measures for potential environmental and social impacts identified ;
- Monitoring plan for the implementation of the mitigation measures;
- The estimated cost of implementation of the mitigation and monitoring measures ;
- Institutional arrangements necessary for implementing the environmental management plan;
- Activities for strengthening of institutions, project staff and local population capacities;

In the context of the EMP, the EIA team will define the magnitude and level of responsibilities that are attributable to the project in the modification and impacts to the environment (in relation also to other initiatives and developments foreseen or ongoing). The EIA team will also take into consideration in its EMP, other mitigating initiatives, such as for instance the strengthening of forest governance. Finally, the EIA team will also present the EMP so that it enables the project to comply with conditions of project approval, ensures that mitigation measures are effective, and provide data that will be used during environmental audits.

Activity 5: GBV Action Plan:

The EIA team will suggest efficient measures to prevent and counter the occurrence of SGBV in the Project areas; and suggest methods to ensure equality in the project activities related to direct beneficiaries, in alignment with the SCRP GBV Action Plan. The GBV will include, but not be limited to, the following:

- GBV procedures,
- GBV-related training and monitoring activities (pre-deployment and during project implementation) – for communities and construction workers, aid workers going into communities, etc...

The duration of the appointment is of xxx The start date for the appointment is foreseen for xxxx.

The appointment will take place in the activity location, for all relevant and necessary field data collection, and home-based for all desk reviews, analyses, drafting and editing of reports.

IV. Expected results and outputs

Output

The EIA Team will produce a report which can be easily understood by the public. The report will include the following:

- Executive summary;
- Note on the methodology used throughout the study and assessment;
- Description of the context of the project including identification of the relevant laws and regulations (see activity 1);
- Description and baseline of the Environment in the project area (see activity 2);
- Detailed assessment of the environmental and social impacts of the project (see activity 3);
- Suggestions for the refinement of the ESMF for the mitigation of the environmental impacts of the project (see activity 4);
- Environmental Management Plan, including mitigation and monitoring(see activity 5) ;
- GBV and Gender Equality Action Plan (see activity 6).

Annexes will include: list of meetings and consultations, composition of the EIA team, and any other relevant information. All collected data will be presented in both hard copies and digital forms.

The draft reports, including in particular the detailed assessment of environmental and social impacts, and the management plans required, will be submitted to the IP 5 weeks into the appointment. Comments of project stakeholders, following consultations on the conclusions of the assessment and plans, will be provided to the EIA team 1 weeks after submission of the draft report. The final report, including all annexes and incorporating comments, will be available on xxx in digital format.

The report and annexes will be provided in English.

Expected impacts

- Positive contribution to the overall success of the SCRP;
- Significant mitigation or elimination of adverse environmental and social impacts, due to the implementation of project activities;
- Effective ownership of mitigation and monitoring measures by project staff and concerned populations.

V. Profile of the team

Profile of the EIA team

- Minimum experience of five 5 years in Environmental Impact Assessments. Specific experience on EIA for community infrastructure and in Somalia is an asset ;
- Having successfully performed at least two (2) similar assessments of which one (1) financed by World Bank.
- Team composed of experts and staff with the following profiles (as a minimum):

Expert in Environmental Impact Assessments – team leader

PhD or Masters degree in environmental science, natural resource management or equivalent; fifteen (15) years of relevant professional experience:

- Experience as multi-disciplinary team leader for Environmental and Social Impact Assessments;
- Proven experience in biodiversity conservation and landuse planning;
- Excellent knowledge of methodologies necessary of Environmental and Social Impact Assessment in the context of community infrastructure;
- Sound knowledge of environmental mitigation and monitoring plans
- Sound knowledge of legislation and donor policies that will affect the environmental management of the project;
- Experience in disaster-affected contexts is an asset;
- Fluency in English.

Expert in Social Science and Socio-economics

PhD or Masters degree in social sciences or equivalent; ten (10) years of professional experience:

- Excellent analytical skills in analysis of social impacts in community infrastructure or related projects
- Experience in data collection and analysis, from secondary sources such as governmental statistics, sampling, etc.;
- Sound knowledge of legislation and donor policies that will affect social management of the project;
- Experience in Gender Equality and Women's Empowerment;
- Fluency in English.

Expert in Terrestrial Ecology or Biological Sciences

PhD or Masters Degree in Environmental Science, Biological Science, Ecology or equivalent; ten (10) years of professional experience:

- Proven experience in biodiversity conservation, management of natural resources, and/or management of protected areas;

- Experience on the assessment of terrestrial and aquatic ecosystems;
- Experience on the evaluation of environmental impacts of development projects;
- Sound knowledge of the environmental issues in community infrastructure-related issues;
- Knowledge of the procedures for EIA on protected or classified areas;
- Fluency in English.

Outline for Detailed ESMP

1. Content
2. Tables
3. Figures
4. List of Acronyms and Abbreviations
5. Executive Summary
6. Introduction
7. Project Background
 - Project Components/Activities
 - Purpose of the ESMP / Objectives
8. Sub-Project Area Description
 - Bio-Physical Environment
 - Administration and Governance
 - Social Services
 - Population Profile
9. Proposed Sub-Project
 - Describe details of sub-project, including designs, project characteristics
10. Environmental and Social Risks and Impacts
 - General positive impact of SCRP
 - Positive impact of sub-project
 - Negative E&S Impacts (sort by ESS)
11. Mitigation Measures, Responsibilities and Monitoring Arrangements
 - Table with mitigation measures, responsibilities, indicators

12. Institutional Arrangements and Responsibilities

13. Stakeholder Engagement

- List stakeholder engagements undertaken for this ESMP and their outcomes
- Consultations undertaken to date

14. GRM

- Brief description of GRM that will be implemented in the sub-project area

15. Implementation Budget

- List implementation budget for sub-project

16. Conclusion

17. References

18. Annexes

- Including attendance lists for consultations, site photos etc...

Sample ESMP Checklist

This is a simple ESMP or ESMP Checklist, that can be used for simple construction works.

Associated Project Activity:	E&S Risk and Impact	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Monitoring Indicators	Mitigation Budget	
ESS 1: Environmental and Social Assessments							
Lack of inclusion can lead to grievances over sub project selection and benefits. There is a risk that some groups are not included in decision making fora and that they do not end up benefitting from the sub projects. This can lead to grievances over the decision-making fora, those in decision-making powers and the sub projects.	Implement and monitor GRM	Contractor/PIU	Throughout Activity	GRM developed & register in place to show grievance status	Hotline implemented by PIU		
	Implementation of contractor management procedures (see ESMF)						
ESS 2: Labor and Working Conditions							
Security of all Project workers	Implement and monitor Security Management Plan (SMP)	Contractor / PIU	Throughout Activity	SMP covering specific area of intervention exists Record to indicate monitoring of SMP			
	Risks of child and forced labor	Ensure that labor for the project will be sourced and managed responsibly including the set-up of a workers' GRM.	Contractor/PIU	Throughout activity	Labor register showing age and sex of persons engaged. Worker's GRM in place	Contractor	

<p>Lack of occupational health and safety (OHS) for workers deployed at construction sites.</p>	<p>Workers' PPE will comply with good practice (always hardhats, as needed masks and safety glasses, harnesses and safety boots)</p> <p>COVID 19 health measures and awareness to be met. (Sanitizers, masks, hand wash, posters etc.)</p> <p>Training on use of PPE</p> <p>Implement procedure of dealing with accidents and exposures</p> <p>hours worked, recordable incidents and corresponding</p>	<p>Contractor</p>	<p>Throughout activity</p>	<p>PPE provided</p> <p>Training held</p> <p>Incidents recorded; RCAs conducted</p> <p>Lists of dates, number of trainees, and topics available</p>	<p>Contractor</p>	
<p>Delayed payment of workers or community workers leading to complaints and conflict</p> <p>Underpayment of contracted workers or supply workers</p> <p>Labor and working conditions of community workers don't comply with WB and Somali legislation – including occupational health and safety risks.</p>	<p>Implement and monitor the Labor Management Procedures (LMP) (see ESMF)</p> <p>Develop and implement OHS Plan for workers</p> <p>Listing of all staff and titles, new hires and departure sites visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector or auditor name</p>	<p>Contractor</p>	<p>Throughout Project activity</p>	<p>Audit records in place</p> <p>OHS Plan in place and compliance status available</p> <p>Staff lists available</p> <p>Site visits conducted</p>	<p>Contractor</p>	
<p>Poor working conditions: unsafe work environment</p>	<p>Conduct safety risk assessment of work site/sub-project and provide safety talks</p>	<p>Contractor</p>	<p>Commencement of activities</p>	<p>A record of Safety Risk Assessment Reports &</p>	<p>Contractor</p>	

					A record of safety talks conducted – as part of the OHS Plan		
	Labor standards are not in accordance to national laws and international standards Poor working conditions: lack of workers' rights	Implement and monitor the LMP	Contractor	Throughout Project activities	Audit report available	Contractor	
	Discrimination against women in employment Labor influx leads to increase of GBV cases	Contractor to develop recruitment and retention policies that enable fair working conditions and women's safe and equitable participation. List number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, and skill level (unskilled, skilled, supervisory, professional, management).	Contractor/PIU	Commencement of activities	Training of workers on GBV undertaken Training of communities on GBV undertaken CoCs with provisions on GBV/SEAH signed by all workers and understood Workers' GRM includes reporting channels and procedures for reporting cases of SH List of workers available	Contractor	

ESS 3: Resource Efficiency and Pollution Prevention and Management

	Generation of solid waste	Appropriate designated areas for disposal of solid waste shall be identified in consistence with the local and international requirements. Waste collection and disposal pathways and sites will be identified for all major waste types expected from excavation, demolition and construction activities.	Contractor	Throughout activity	Record of actual sites	Contractor	
--	---------------------------	---	------------	---------------------	------------------------	------------	--

		<p>Construction and demolition wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers.</p> <p>Construction waste will be collected and disposed properly by licensed collectors</p> <p>The records of waste disposal will be maintained as proof for proper management as designed.</p> <p>Whenever feasible Contractor will reuse and recycle appropriate and viable materials (except when containing asbestos)</p>					
Generation of dust and noise Pollution from construction wastes and water use Erosion and sedimentation of rivers from earth works and run-off during the construction phase water pollution (turbid water flow) habitat disturbance of aquatic ecology in		<p>Where feasible, practice minimal or none vegetation disturbance during the implementation of the project, avoid exposing the soils to external weather conditions.</p> <p>(Drainage / canalization systems will be reconstructed according to good engineering practice, including appropriate dimensions, sedimentation basins, and connection to</p>	Contractor/PIU	Throughout activity	<p>Measures implemented TSS levels in potentially affected rivers close to baseline status</p> <p>Implementation of soil erosion control measures as applicable to the sub-project</p>	Contractor	

<p>rivers, topographic modification and consequent negative impacts such as change of groundwater level and the ground stability near the excavated area.</p>	<p>treatment (disinfection) facilities as required</p> <p>Embankment protection should be designed and constructed as not to silt, pollute, block or otherwise negatively impact rivers; including during construction activities (Engineers to review this)</p> <p>There will be procedures in place for prevention of and rapid response to accidental spills of fuels, lubricants and other toxic or noxious substances, and for their recovery and appropriate disposal</p> <p>Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies.</p> <p>There will be no uncontrolled discharge of process waters, cement slurries, or any other contaminated waters into the ground or adjacent to rivers</p>					
<p>Disposal and management of large amounts of excavated material generated from construction activities during the construction phase</p>	<p>Should the project utilize raw materials for construction activities, the material will be sourced through measures specified in Good International Industry Practices (GIIPs)</p>	<p>Contractor</p>	<p>Throughout activity</p>	<p>Excavated material disposed at designated sites</p> <p>Where this is reused, measures applied as stated in GIIPs</p>	<p>Contractor</p>	

<p>Increased levels of vibration from moving of construction vehicles and machinery</p>	<p>High level maintenance of the vehicles to reduce the vibrations Selecting equipment with lower sound power levels Installing suitable mufflers on engine exhausts and compressor components Installing acoustic enclosures for equipment casing Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance.</p>	<p>Contractor</p>	<p>Throughout activity</p>	<p>Record of maintenance of vehicles Noise level against baseline status Mufflers installed Acoustic enclosures installed Record of meeting/sensitization program to inform the community</p>		
<p>Soil Erosion during desilting of weirs/dams and reinforcement of river banks</p>	<p>Implement soil control measures</p>	<p>Contractor</p>	<p>Throughout activity</p>	<p>Record of soil erosion control measures in place</p>	<p>Contractor</p>	
<p>Water contamination from oil spills during works Sil contamination from oil spills</p>	<p>Implement water pollution control measures Implement measures to protect the soil from oil contamination</p>	<p>Contractor</p>	<p>Throughout activity</p>	<p>Oil/water separators installed and operational Storage of petroleum products such as fuel, oil, etc... shall be done on sealed surface to prevent soil contamination</p>	<p>Contractor</p>	
<p>Generation of a wide range of waste effluents (waste water from washing and cleaning operations, oils and oily water generated by</p>	<p>Design activities employing technologies that are least polluting;</p>	<p>Contractor</p>	<p>Throughout activity</p>	<p>Appropriate technologies in place</p>	<p>Contractor</p>	

machinery maintenance, leaked/spilled fuels and oils, waste effluent discharges from the processing operation, animal wastes, and others)	Carry out treating and recycling of waste effluents as far as possible and practical before safely being discharged in designated areas or reused			Analytical results to show compliance (following WB EHS Guidelines)		
Uncontrolled discharges of these wastes and other effluents can potentially contaminate the soil, pollute the nearby water bodies and degrade their value for communities and ecology	Ensure that waste is not released into any drinking water source, cultivation fields, or critical habitat	Contractor	Throughout activity	Record on status and management of waste	Contractor	
Generation of solid wastes (including human and animal secreta, wastage from packing operations and others)	Minimize use of non-biodegradable substances (e.g. for packaging) Minimize generation and Recycle solid waste as far as possible and practical Adopt composting of biodegradable waste if practicable Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, cultivation fields, irrigation channels, natural drainage paths, wetlands and critical habitat, the existing waste management system in the area, local routes, and general aesthetic value of the area	Contractor	Throughout activity	Checklist in place to show adherence to the following; Use of biodegradable materials Recycling solid waste Composting Record of waste disposed in designated sites Status of disposal site	Contractor	

		Ensure the protection of disposal areas					
	Inappropriate disposal of these wastes can potentially have negative environment and ecosystem impacts in the area, while also contaminating soil and water	Ensure that disposal of waste will not be a danger to children Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal	Contractor	Throughout activity	Record of sensitization program GRM in place	Contractor	
ESS 4: Community Health and Safety							
	Increased GBV/SEAH cases	Implementation and monitoring of GBV / SEA Action Plan (see ESMF)				Audit report in place Records in place	
	Spread of communicable diseases (SIIs , HIV/AIDS etc..)	Community awareness sessions on communicable diseases	Contractor / PIU	Commencement of activity	Records showing number of community awareness sessions	PIU	
	Provision of cash support for affected households, cash for work and unconditional cash transfers raise the profile for targets by opportunistic armed actors in a context of recent history of relative lawlessness and the potential for increased conflict.	Involve UNOPS and other humanitarian and development organizations with valuable knowledge and experience in delivering specialized operations in the target locations and provide relative advantage to challenges of access to site and the identification and mitigation of security threats to project operations	Contractor / PIU	Throughout activity	Records to show involvement of UNOPS and other organizations	Contractor / PIU	
	Delayed payments / cash transfers may lead to complaints and conflicts	Timely payment Communication / awareness campaign of payment mechanisms	Contractor / PIU	Throughout activity	Number of sessions held on communication awareness	Contractor	
	Risks of sexual exploitation and abuse or sexual	Engage a dedicated specialist to support oversight and management of these risks	PIU	Throughout activity	Specialist engaged	PIU	

	harassment, such as requests for sexual favors						
	Exposure of community members to physical hazards on project sites Traffic and road safety hazards	Undertake safety precautions to address safety hazards for the nearby community, including, safety/warning signage, safety barrier around the construction site, and safe driving practices Informing public about construction risks The Contractor formally agrees that all work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and environment.	Contractor	Commencement of activity	Records to show community sensitization on safety, in place Safety warning signs in place Traffic management plan in place Training for road workers on risks conducted	Contractor	
	Removal of debris affects new location aesthetically Debris removal poses a safety risk for the community at the new location	Implement and monitor waste management procedures based on <i>World Bank Group Environmental, Health, and Safety General Guidelines</i>	Contractor	Throughout activity	Waste management procedure in place Records of amount of waste disposed available		
	Potential transfer of flood risk to downstream areas	Project to mitigate this through extensive community engagement. Assist local communities to understand how the project design and siting ensures flood risks in highly populated areas and the lower reaches of rivers, once project is properly and successfully implemented.					

ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement						
Loss of assets, sources of income, or means of livelihoods	Implementation and monitoring of Resettlement Action Plan (RAP)	PIU	Prior to commencement of activities	Audit report	PIU	
With weaker or inexistent formal land administration authorities, processes for land expropriation compensation may not be in place or fully established. As a result, resettlement as well due diligence for establishing ownership for voluntary land donations may be challenging	Community consultations to be conducted before establishing facilities (SEP)	PIU	Prior to commencement of activities	Record of community meetings held, dates and places	PIU	
Disputes over land ownership	Implement and monitor GRM	Contractor / PIU	Throughout activity	No. of follow ups made and resolved	PIU	
Blocked access to people in the area	Ensure that the local routes, drainage and community access are not blocked by such schemes	Contractor	Throughout activity	Zero complaint on blocked access to people in the area	Contractor	
Site Access might require acquisition of land, houses, buildings and other physical infrastructure	Implementation and monitoring of Resettlement Action Plan (RAP)	PIU	Prior to commencement of activity	Audit report		
Encroachment on private and public land: Sub project activities may require land that is possible claimed or owned by someone.	Inform the concerned communities about detailed activity plan including alternate route during construction, secure community consent, and implement all the safeguards agreed with the community	Contractor / PIU	Prior to commencement of activity	Record of stakeholder engagements and minutes	Contractor / PIU	

	Firming up conflict over land ownership by making people need to claim land rather than share. Sub projects may require land, which may lead to individuals making land claim to proof land ownership prior to sub project commencement – in the hope of reimbursement, for example. This may foster conflicts over local land use, tenure and ownership, and also contradict encouragement of communities to share land	Engagement of higher authorities such as local council to iron out disputes and claims over land.	PIU	When necessary	Minutes of meeting with higher authorities to clear the disputes	PIU	
--	--	---	-----	----------------	--	-----	--

ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

	Sensitive areas may be impacted by project activities	Screening process will identify potential impacts on sensitive areas Avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas, implement RFP Site selection will include an analysis of the immediate area in terms of population, buildings, slope, nearby wadis/seasonal water flows, and will exclude those which may be adjacent to areas with environmental sensitivities	PIU	Prior to commencement of activity	Screening report identifying protected areas Report indicating sites selected bearing in mind protected areas identified above.	PIU	
	Loss of precious ecological assets, if they are	No or minimized removal of flora or wildlife in protected	Contractor	Throughout activity	Record of sensitization and attendance list		

<p>inappropriately located they could cause secondary encroachment into historical/cultural buildings/areas, disrupt hydrology of natural waterways, regional flooding, and hazards</p>	<p>or sensitive areas shall be allowed</p> <p>Ban use of firewood for fuel on any construction camps or areas</p> <p>Ban hunting and game consumption on construction site and for all construction workers</p> <p>Limit plant removal to grasses, weeds or small bushes</p> <p>For any plant removal or tree felling, four replacement plants should be replanted</p>			<p>Record of instruction and</p> <p>No fire wood is used</p> <p>Record of sensitization</p> <p>No. of plants re-planted and location</p>		
---	--	--	--	--	--	--

ESS 8: Cultural Heritage

<p>There is the potential for chance find of cultural or archeological significance during construction that could potentially be impacted from the construction</p>	<p>See Chance Find Procedures (provided by PIU)</p>	<p>Contractor</p>	<p>Throughout activity</p>	<p>Instruction on how to treat chance find</p>	<p>Contractor</p>	
<p>Civil work activities could impact intangible cultural heritage (e.g. disruption of religious/cultural festivals, impacts on burial grounds etc..)</p>	<p>See Chance Find Procedures</p>	<p>Contractor</p>	<p>Throughout activity</p>	<p>Record of impacted intangibles and by what activity</p>		

Annex 11: Municipal and Solid Waste Management Plan

The actual preparation and implementation of the project activities will result in the generation of municipal and solid waste which will require appropriate methods of handling and disposal. The Waste Management Plan is developed for the Project to set out the primary applicable requirements associated with waste management in compliance with related national legislation and international standards, specifically the applicable World Bank's Safeguards Standard, the Environmental and Social Standard No. 3 (**Resource Efficiency and Pollution Prevention and Management**). In this context, this particular safeguard requires the borrowers to avoid or minimize adverse impacts on human health and the environment caused by pollution from project activities and also where feasible, avoid or minimize generation of hazardous and non-hazardous waste

Management of Municipal and Solid Waste

Throughout the Project life, different types of wastes and materials will be generated from different sources and activities. The purpose of this plan is to guide and obtain the acceptable collection, segregation, storage, handling, transportation and disposal of municipal and solid waste generated from the Project activities in a way that minimizes the impacts on human health and environment, including minimization of loss of valuable reusable/recyclable materials. In this respect, a survey must be conducted to assess the waste management requirements of the service or project areas and develop a compatible program for the collection, handling and transportation of waste.

For the avoidance of doubt, solid waste is in this respect defined as nonliquid material that no longer has any value to the person who is responsible for it. The words rubbish, garbage, trash, or refuse are often used as synonyms when talking about solid waste. The term municipal solid waste in relation to this project refers to solid waste from camps and worksites. These types of waste are expected to be generated during the SCRP Project preparation and implementation. A typical waste management system expected to be put in place includes the following elements:

- Waste generation and storage
- Segregation, reuse, and recycling at points of waste generation
- Primary waste collection and transport to a transfer station or community bin
- Street sweeping, where applicable
- Management of the transfer station or community bin
- Secondary collection and transport to a designated landfill site
- Waste disposal in landfills
- Collection, transport, and treatment of recyclables at all points on the solid waste pathway (collection, storage, transport, and disposal).

Physical handling of solid waste and recyclables (storage, collection, transport, treatment, and so on) is just one SWM activity; it alone cannot fulfill the requirement for sustainable and integrated solutions and hence the need to develop a management plan that shall commit the Implementing Partners of the SCRP Project to ensure management of municipal and solid waste generated at various construction/work sites.

It will be critical thereafter, to ensure that workers and planners get training to develop their capacity to appropriately manage generated municipal and solid waste. Additionally, there will be need to conduct public information and awareness and education programs on municipal and solid waste management to the communities that will interact with the Implementing entities during the SCRP Project preparation and implementation period, and it will be the implementing partner to ensure such places/sites are well managed in this respect.

Management Measures

- Reduction of waste generation (through management practices, avoiding or decreasing materials use, etc.) is the primary goal of this plan.
- Types of waste identified in the applicable Somalia state for possible recycling, will be communicated to the Implementing Partners who shall ensure this waste is segregated from the ordinary municipal and solid waste meant for transportation and final disposal at a landfill.
- Recyclable waste once segregated from the rest, at generation point and stored on site, in reserved area, in special well labelled bags, ready to be transported to recycling plants. Relevant training will have to be conducted to ensure this is implemented.
- Recyclable wastes to be sent to identified and licensed recycling/recovery firms.
- Suitable waste containers will be provided at the places of waste generation to facilitate safe and environmentally sound temporary storage. All containers will be clearly marked according to contents.
- Non-recyclable municipal and solid waste will be collected in special trash bins and temporarily stored onsite for final disposal.
- Onsite collection and transport of non-recyclables should be done in a timely manner to avoid accumulation of solid waste at secondary storage sites.
- Personnel that will be handling municipal and solid waste generated, will be trained for proper handling and management of the same
- In the event that there are spills of materials other than municipal and solid waste (hazardous materials), these will be prevented through careful and sensible management of the same. Where applicable, preventive maintenance will be performed on various project equipment to avoid potential spills
- Regular inspections of storage areas will be conducted. If damaged or leaking containers are detected, they will be replaced.
- Biological waste generates most nonsensical odor. Where feasible, this kind of waste can be segregated for waste treatment process which include composting, vermicomposting, anaerobic digestion, or any other appropriate biological process for stabilizing waste. Composting or biodegradation of biological waste can be done even at a sanitary landfill for as long as there is a dedicated portion (about 25% or less) for this activity.

- Good house-keeping shall be instituted together with operating practices, including inventory control to reduce the amount of waste resulting from materials that are out-of-date, off specification, contaminated, damaged, or excess to project needs
- Procurement measures shall be instituted that recognize opportunities to return usable materials such as containers and which prevents the over ordering of materials

Transportation and Disposal

The following management controls will be in place for transport, recycling, recovery and disposal of municipal and solid waste:

- A protocol will be signed with the related municipality for transfer of municipal and solid waste to the sanitary landfill.
- Agreements will be signed with licensed firms for transport of segregated recyclable and packaging wastes.

Monitoring and Reporting

The waste types, amount collected of each type and waste classifications, will be recorded on a monthly basis. Records for generated waste from time of generation to final destination will be maintained. Daily inspections regarding on-site management of wastes will be conducted from the SCRP preparation phase through to implementation of the project. In addition to these inspections, internal audits will be conducted quarterly during the preparation and implementation phase by the PIU team and results of inspections and monitoring will be provided to the upper management, as well as to UNOPS Team. Based on monitoring and audit results, corrective and/or enhancing actions will be designed and implemented. Performance of these actions will also be monitored and reported.

Training

The Implementing Partner will ensure sufficient training is provided to all personnel (including subcontractor personnel, where applicable). The scope of the training will ensure that workers are able to fulfil their waste management roles and functions through awareness on relevant aspects of this plan, related legislation and standards and general waste management practices (e.g. tidiness, waste segregation, etc.).

Training details (e.g. participants, subjects, training hours provided, etc.) will be recorded and the records will be kept on-site. Personnel working routinely with hazardous wastes and materials will receive additional specialized training detailing the specific handling, segregation, labeling, storage, spill response, and disposal requirements.

Review and Update

This Plan is a living document and the responsibilities, procedures and compliance actions shall be updated as required (e.g. after a change in related legislation). It is the responsibility of the PIU and the Implementing Partner to be fully aware of its contents. The Implementing Partner is to provide relevant training to staff and to ensure that procedures are being implemented to achieve compliance with this Plan.

Municipal and Solid Waste Management Plan

Activities	Potential E&S Issues and Risks	Proposed Mitigation Measures	Responsibilities	Timeline	Budget
Assessment of amount and type of waste to be generated during the SCRP Project Implementation at various worksites	Poor management of generated waste leading to indiscriminate disposal	Develop a schedule/program for collection, handling and transportation of waste based on assessment made on amount of waste to be generated in a given time period Dissemination of clear messages to the community and workers around the management of waste	PIU working in collaboration with the Implementing Partners Implementing Partner working in collaboration with local Municipality		
Training	Non or poor segregation of recyclables from non-recyclables at generation point	Conduct appropriate training of all waste handlers to ensure appropriate segregation of waste.	Implementing Partner in collaboration with the PIU		
Collection of Solid Waste from generation point	Risk of municipal and solid waste indiscriminately disposed for lack of waste container bags	Ensure timely provision of waste container bags in strategic places	Implementing Partner		
	Risk of infection to the handlers due to secondary handling	Ensure appropriate PPE is provided to all the handlers and			
	Prevent special waste from being mixed with ordinary waste	Ensure segregation of recyclables at source. Additionally, ensure awareness raising on the benefits of segregation			
	Risk of emission of air pollutants due to burning of waste	Ensure no burning of generated waste at any particular spot.			
	Contamination of sites by stray animals creating an eyesore	Ensure the collected waste stored at site for final disposal is not accessed by stray animals			
Storage of collected municipal and solid waste in readiness for final disposal	Risks of waste overflowing at storage site, creating a nuisance to the surrounding environment	Ensure awareness raising among own personnel and the local community on the available solid waste management system	Implementing Partner		
		Make available sufficient storage facilities in accordance to the quantities of waste generated.			
		Where feasible, provide covered storage facility so that waste is not exposed to open atmosphere.			
		Ensure that storage facilities or bins are of an appropriate design for ease in handling, transfer, and transport.			
		Ensure that storage facilities are attended daily and are emptied and cleaned regularly.			

	Risk of infection to the handlers due to secondary handling	Ensure that manual handling and multiple handling of waste are avoided or are done with proper safety and care.			
Transportation of municipal and solid waste to sanitary landfill	Littering of waste into the open environment	Ensure waste is not visible to public or exposed to the open environment, thus preventing the scattering of waste, by covering the vehicle transporting the waste	Implementing Partner working in collaboration with Local Municipal Council		
	Accumulation of waste at storage site to the extent this becomes an eyesore.	Attend to storage facilities daily for clearing of waste. Empty bins or containers before they start overflowing			
	Risk of infection to the handlers due to multiple handling of waste	Ensure that transport vehicles are designed so that multiple handling of waste is avoided before final disposal.			
	Risk of failure to fulfil collection schedule of generate waste and other vehicle safety risks in the community	Ensure proper maintenance of collection vehicle to ensure safe collection and transportation of waste	Implementing Partner in collaboration with the local municipal council		
Waste disposal	Biodegradable waste can be a nuisance at sanitary landfills especially the generation of disturbing odour	Where possible, restriction of nonbiodegradable and nonrecyclable waste to sanitary landfill enables a manageable environment at the landfill, reduced leachate production and prolongs the lifespan of the sanitary landfill.	Implementing Partner working in collaboration with the representatives from the local community		
Recording of waste streams	Risk of not having information on what and how much has been disposed	Collection of data and information about the waste streams by type, quantities, and potential use/disposition	Implementing Partner		
Labour matters	Workers denied the opportunity to complain they do not have adequate PPE to protect themselves against tetanus and other infectious diseases that may result from exposure to particular type of waste	Grievance Mechanism in place	Implementing Partner		
Emergency events	<ul style="list-style-type: none"> - Spillage, - Occupational exposure to infectious - Accidental releases of waste to the environment, - Fire - Other emergent events 	Emergency response plan	Implementing Partner		

Designated Site for Final Disposal of Municipal and Solid Waste

Availability of an engineered landfill in a local municipality improves final disposal of waste. Open dumping of waste can cause irreparable damage to the environment by polluting land, water, and air and consequently affecting human health and lowering people's quality of life.

Open dumping must therefore be prohibited at all costs. The Implementing Partner, working in collaboration with the PIU Team must engage the local municipal authorities to ensure safe disposal of solid waste in an engineered landfill. Crude dumping of waste at open dumping grounds must be discouraged in the strongest terms. The local Municipal Council must be encouraged to identify suitable land for the construction of engineered landfills following the prescribed guidelines for the basic landfill requirements for particular selection and design.

ANNEX 14: Infectious Disease and Waste Management Plan Template

1. Introduction

1.1 Describe the project context and components

1.2 Describe the targeted healthcare facility (HCF):

- Type: E.g. general hospital, clinics, inpatient/outpatient facility, medical laboratory, quarantine or isolation centers;
- *Special type of HCF in response to COVID-19: E.g. existing assets may be acquired to hold yet-to- confirm cases for medical observation or isolation;*
- Functions and requirement for the level infection control, e.g. biosafety levels;
- Location and associated facilities, including access, water supply, power supply;
- Capacity: beds

1.3 Describe the design requirements of the HCF, which may include specifications for general design and safety, separation of wards, heating, ventilation and air conditioning (HVAC), autoclave, and waste management facilities.

2. Infection Control and Waste Management

2.1 Overview of infection control and waste management in the HCF

- Type, source and volume of healthcare waste (HCW) generated in the HCF, including solid, liquid and air emissions (if significant)
- Classify and quantify the HCW (infectious waste, pathological waste, sharps, liquid and non-hazardous) following WBG [EHS Guidelines](#) for Healthcare Facilities and pertaining GIIP.
- *Given the infectious nature of the novel coronavirus, some wastes that are traditionally classified as non-hazardous may be considered hazardous. It's likely the volume of waste will increase considerably given the number of admitted patients during COVID-19 outbreak. Special attention should be given to the identification, classification and quantification of the healthcare wastes.*
- Describe the healthcare waste management system in the HCF, including material delivery, waste generation, handling, disinfection and sterilization, collection, storage, transport, and disposal and treatment works
- Provide a flow chart of waste streams in the HCF if available
- Describe applicable performance levels and/or standards
- Describe institutional arrangement, roles and responsibilities in the HCF for infection control and waste management

2.2 Management Measures

- Waste minimization, reuse and recycling: HCF should consider practices and procedures to minimize waste generation, without sacrificing patient hygiene and safety considerations.
- Delivery and storage of specimen, samples, reagents, pharmaceuticals and medical supplies: HCF should adopt practice and procedures to minimize risks associated with delivering, receiving and storage of hazardous medical goods.
- Waste segregation, packaging, color coding and labeling: HCF should strictly conduct waste segregation at the point of generation. Internationally adopted method for packaging, color coding and labeling the wastes should be followed.
- Onsite collection and transport: HCF should adopt practices and procedures to timely remove properly packaged and labelled wastes using designated trolleys/carts and routes. Disinfection of pertaining tools and spaces should be routinely conducted. Hygiene and safety of involved supporting medical workers such as cleaners should be ensured.

- Waste storage: A HCF should have multiple waste storage areas designed for different types of wastes. Their functions and sizes are determined at design stage. Proper maintenance and disinfection of the storage areas should be carried out. Existing reports suggest that during the COVID-19 outbreak, infectious wastes should be removed from HCF's storage area for disposal within 24 hours.
- Onsite waste treatment and disposal (e.g. an incinerator): Many HCFs have their own waste incineration facilities installed onsite. Due diligence of an existing incinerator should be conducted to examine its technical adequacy, process capacity, performance record, and operator's capacity. In case any gaps are discovered, corrective measures should be recommended. For new HCF financed by the project, waste disposal facilities should be integrated into the overall design and ESIA developed. Good design, operational practices and internationally adopted emission standards for healthcare waste incinerators can be found in pertaining EHS Guidelines and GIIP.
- Transportation and disposal at offsite waste management facilities: Not all HCF has adequate or well-performed incinerator onsite. Not all healthcare wastes are suitable for incineration. An onsite incinerator produces residuals after incineration. Hence offsite waste disposal facilities provided by local government or the private sector are probably needed. These offsite waste management facilities may include incinerators, hazardous wastes landfill. In the same vein, due diligence of such external waste management facilities should be conducted to examine its technical adequacy, process capacity, performance record, and operator's capacity. In case any gaps are discovered, corrective measures should be recommended and agreed with the government or the private sector operators.
- Wastewater treatment: HCF wastewater is related to hazardous waste management practices. Proper waste segregation and handling as discussed above should be conducted to minimize entry of solid waste into the wastewater stream. In case wastewater is discharged into municipal sewer sewerage system, the HCF should ensure that wastewater effluent comply with all applicable permits and standards, and the municipal wastewater treatment plant (WWTP) is capable of handling the type of effluent discharged. In cases where municipal sewage system is not in place, HCF should build and properly operate onsite primary and secondary wastewater treatment works, including disinfection. Residuals of the onsite wastewater treatment works, such as sludge, should be properly disposed of as well. There're also cases where HCF wastewater is transported by trucks to a municipal wastewater treatment plant for treatment. Requirements on safe transportation, due diligence of WWTP in terms of its capacity and performance should be conducted.

3. Emergency Preparedness and Response

Emergency incidents occurring in a HCF may include spillage, occupational exposure to infectious materials or radiation, accidental releases of infectious or hazardous substances to the environment, medical equipment failure, failure of solid waste and wastewater treatment facilities, and fire. These emergency events are likely to seriously affect medical workers, communities, the HCF's operation and the environment.

Thus, an Emergency Response Plan (ERP) that is commensurate with the risk levels is recommended to be developed. The key elements of an ERP are defined in ESS 4 Community Health and Safety (para. 21).

4. Institutional Arrangement and Capacity Building

A clearly defined institutional arrangement, roles and responsibilities should be included. A training plan with recurring training programs should be developed. The following aspects are recommended:

- Define roles and responsibilities along each link of the chain along the cradle-to-cradle infection control and waste management process;
- Ensure adequate and qualified staff are in place, including those in charge of infection control and biosafety and waste management facility operation.
- Stress the chief of a HCF takes overall responsibility for infection control and waste management;

- Involve all relevant departments in a HCF, and build an intra-departmental team to manage, coordinate and regularly review issues and performance;
- Establish an information management system to track and record the waste streams in HCF; and
- Capacity building and training should involve medical workers, waste management workers and cleaners. Third-party waste management service providers should be provided with relevant training as well.

5. Monitoring and Reporting

Many HCFs in developing countries face the challenge of inadequate monitoring and records of healthcare waste streams. HCF should establish an information management system to track and record the waste streams from the point of generation, segregation, packaging, temporary storage, transport carts/vehicles, to treatment facilities. The HCF is encouraged to develop an IT based information management system should their technical and financial capacity allow.

As discussed above, the HCF chief takes overall responsibility, leads an intra-departmental team and regularly reviews issues and performance of the infection control and waste management practices in the HCF. Internal reporting and filing systems should be in place.

Externally, reporting should be conducted per government and World Bank requirements.

COVID-19 Infectious Control and Waste Management Plan					
Activities	Potential E&S Issues and Risks	Proposed Mitigation Measures	Responsibilities	Timeline	Budget
Functional Health Care System	Medical and Health care waste indiscriminately disposed	Functional incinerator and health care system in place at identified Health Care Facilities	Ministry of Health working in collaboration with the contractor		
Stakeholder engagement	Spread of COVID 19 to workers and community members	Dissemination of clear messages to the community and workers around social distancing, wearing of masks, high risk demographics, self-quarantine, and, when necessary, mandatory quarantine	Contractor working in collaboration with Ministry of Health		
Sensitizing workers and the local community on the use of sanitizers and the use /disposal of masks	COVID 19 infection rate rises	Provide a sensitization talk on basic protective measures against Covid-19, as derived from general advice provided by the WHO and based upon the ICS guidance	IP		
Public Consultation Meetings	Spread of COVID 19 community members and stakeholders	Engage meaningful consultation, to confirm if public meetings will be appropriate or not, in the wake of COVID 19,	IP/PIU		
Project commencement and implementation	Workers potentially exposed to infected COVID 19 community members and among themselves	Provision of appropriate PPE for protection of workers in relation to infection control precautions, particularly facemask, gowns, gloves, handwashing soap and sanitizer	IP / PIU		
		Overall ensuring adequate OHS protections in accordance with General Environmental, Health, and Safety Guidelines (EHSGs) and industry specific EHSGs and follow evolving international best practice in relation to protection from COVID-19			
Workers tested positive with COVID 19	Workers have no access to medical facilities	Workers adequately taken care of (medically insured), to responds to the specific health and safety issues posed by COVID-19	IP		
Labour matters	Workers denied the opportunity to complain they do not have adequate PPE to protect themselves against COVID 19	Grievance Mechanism in place	IP		

Medical/Health care waste segregation, packaging, color coding and labeling	Risk of infection to the handlers	Segregate medical/health care waste at generation point	IP		
Medical/Health care waste storage	Risk of contaminating the surrounding environment, the workers and the community members	Ensure the medical/health care waste storage is properly secured and under lock and key	IP		
Onsite collection and transportation	Risk of infection to the handlers due to secondary handling	Place the different types of medical/health care waste in secured bags colour coded and labelled	IP		
Record of medical/health care waste transported	Unaccounted for medical/health care waste poses a risk to the local community	The transportation would be properly documented, and all vehicles will carry a consignment note from the point-of collection to the treatment facility	IP		
Disinfection of vehicle used to transport medical/healthcare waste	Spread of infection to unsuspecting workers who may be in contact with the vehicle	Vehicles used for the carriage of medical/health care waste would be disinfected regularly and prior to use for any other purpose	IP with MoH		
Onsite medical/healthcare waste treatment and disposal	Indiscriminate disposal of hazardous waste	Ensure incineration of all the delivered hazardous waste and appropriate disposal of the resulting ash at a landfill.	IP		
Accommodation and supplies	Poor accommodation and nutrition to a quarantined worker	Quarantined persons should be provided with adequate and culturally-appropriate food and water, appropriate accommodation including sleeping arrangements and clothing, protection for baggage and other possessions, appropriate medical treatment, means of necessary communication if possible, in a language that they can understand and other appropriate assistance	IP		

Emergency events	<ul style="list-style-type: none"> - Spillage, - Occupational exposure to infectious - Exposure to radiation, Accidental releases of infectious or hazardous substances to the environment, - Medical equipment failure, - Failure of medical waste treatment facilities, - Fire - Other emergent events 	Emergency response plan	IP	
Coordination of COVID 19 matters at work sites	Workers and community members not aware of where to report COVID 19 suspects or related matter	Names of Infection Control Staff, their contract information provided in strategic places	IP with MoH	

ANNEX 15: Managing COVID-19 Risks on Construction Sites²⁰⁶

These below requirements should be mandatory for all contractors, they should be issued in a formal, written instruction to the contractor using the template provided below.

Requirements: Construction sites should be treated like offices, with the following steps to be discussed with the Contractor, and enforced by the site supervisor.

General

1. Ensure that the people meeting the following criteria will not come to site:
 - o any personnel showing symptoms of coughing, difficulty in breathing, fever, tiredness, aches and pains, nasal congestion, runny nose, sore throat or diarrhea, until a medical certificate is provided;
 - o vulnerable persons (by virtue of their age, underlying health condition, clinical condition or are pregnant)
 - o any person living with someone in self-isolation or a vulnerable person.
2. In the case that a worker is detected with COVID-19 the site will be closed and workers in contact with the individual will be required to self-isolate for 14 days until medical all-clear is granted.
3. Social distancing of at least 1 meter should be maintained at all times between personnel. Handshakes, hugs and other close contact interactions are therefore prohibited on site.
4. Hand washing station posted at the site entrance, with soap for all workers and people entering the site, and additional stations at locations in the site that make it possible for workers to frequently wash their hands. Hand sanitizers should be provided where hand washing facilities are unavailable to point.
5. A focal point to implement and monitor prevention measures should be designated.
6. No masks are needed on site for work unless hazardous materials are being used.
7. In case of any infringements, contractor will stop work and delays that incur penalties will be the responsibility of the contractor.
8. Contractors will refuse access to the site to any individuals seen breaking the hygiene protocols and may require the contractor to stop all works immediately.
9. Contractor must cooperate with the Somalia country directives in response to the COVID-19 pandemic.
10. All cases should be reported to the PIU as soon as detected, as well as to local health authorities.
11. These protocols are to be recorded as part of the Health and Safety requirements for the site.

Travel to Sites

12. Wherever possible, workers should travel to site alone using their own transport.
13. Risk assessments should be used to determine the risks for local travel to project sites and precautionary measures should be applied if these are deemed necessary.

²⁰⁶ Based on UNOPS recommendations.

14. Sites need to consider:

- Parking arrangements for additional cars and bicycles
- Other means of transport to avoid public transport e.g. cycling
- How someone taken ill would get home.

Site Access Points

15. Focal point appointed by the contractor, with the site supervisor, will check the temperature and ensure hand washing prior to site entry of all personnel.

- Focal point should have a thermometer to do so.
- For larger sites, a nurse or medical staff may be provided, however, the goal is not to treat personnel who may have COVID-19, but identify any symptoms and ensure personnel are immediately removed from the site.

16. Focal point should ask the following questions to the staff:

- Have you had a fever or other symptoms of the COVID-19 in the past 2 weeks?
- Is there anyone in your household who has the symptoms or is ill with COVID-19?
- Is there any person in your neighborhood or community who has been diagnosed with COVID-19?
- Have you been abroad or in contact with travelers from different countries?

17. Ensure personnel wash or clean their hands before entering or leaving the site.

18. Stop all non-essential visitors.

19. Introduce staggered start and finish times to reduce congestion and contact at all time, if possible.

Take into consideration appropriate timings for men and women, according to their other responsibilities. If there are fewer workers on sites ensure safety of female workers from sexual harassment (PSEA issues).

20. Monitor site access points to enable social distancing – site supervisor may need to change the number of access points, either increase to reduce congestion or decrease to enable monitoring.

21. Remove or disable entry systems that require skin contact e.g. fingerprint scanners

22. Reduce the number of people in attendance at site inductions and consider holding them outdoors wherever possible, also ensure 1 meter distance between participants during the inductions.

23. Drivers should remain in their vehicles if the load will allow it and must wash or sanitize their hands before unloading goods and materials.

Communication and Awareness

24. Daily briefing on how to prevent exposure to COVID-19 and on the control measures in the site should be delivered.

25. Post posters about proper handwashing and respiratory hygiene at different project sites (work fronts, temporary offices, and the project operations campus)

Canteens and Eating Arrangements

26. Hand washing is enforced before mealtimes.
27. All personnel should be advised to observe safe distances during eating times.
28. All personnel should avoid sharing food and drinks with colleagues
29. The workforce should be asked to bring pre-prepared meals and refillable drinking bottles from home.
30. Site eating areas will be disinfected daily by the contractor.
31. All rubbish should be put straight in the bin and not left for someone else to clear up.
32. Where catering is provided on site, it should provide pre-prepared and wrapped food only. Where possible payment arrangements should be made such there will be no need to exchange money e.g. contactless cards or pre-arranged monthly payments. Crockery, eating utensils, cups etc. should not be used.

Changing Facilities, Showers and Drying Rooms

33. Introduce staggered start and finish times to reduce congestion and contact at all times. Take into consideration appropriate timings for men and women, according to their other responsibilities.
34. Consider increasing the number or size of facilities available on site if possible.

Avoiding Close Working

There will be situations where it is not possible or safe for workers to distance themselves from each other by 1 meter. The following general principles should be applied:

35. Safety critical work should still be carried out with adequate personnel and under adequate levels of supervision to avoid incidents that may lead to loss of life.
36. Non-essential physical work that requires close contact between workers should not be carried out.
37. Work requiring skin to skin contact should not be carried out.
38. Plan all other work to minimize contact between workers.
39. Establish working groups to minimize the movement of people in the project area to facilitate traceability and control, in case any possible contagion is identified.
40. Re-usable PPE should be thoroughly cleaned after use and not shared between workers. Ensure that female workers are given PPE purposefully designed for women.
41. Single use PPE should be disposed of so that it cannot be reused.
42. Stairs should be used in preference to lifts or hoists.
43. Increase ventilation in enclosed spaces.
44. Regularly clean the inside of vehicle cabs and between use by different operators.

Site Meetings

45. Only absolutely necessary meeting participants should attend.
46. Attendees should be 1 meter apart from each other.
47. Rooms should be well ventilated / windows opened to allow fresh air circulation.
48. Consider holding meetings in open areas where possible.

Cleaning

49. Enhanced cleaning procedures should be in place across the site, particularly in communal areas and at touch points including:
 - Taps and washing facilities
 - Toilet flush and seats
 - Door handles and push plates
 - Hand rails on staircases and corridors
 - Lift and hoist controls
 - Machinery and equipment controls
 - Food preparation and eating surfaces
 - Telephone equipment
 - Key boards, photocopiers and other office equipment
50. Rubbish collection and storage points should be increased and emptied regularly throughout and at the end of each day
51. Hired vehicle vendors should be informed to sanitize the interior of their vehicles daily. Drivers to be informed about the preventive measures as well.
52. Personnel using motorbikes should also sanitize the areas of the bike most touched.

Procedure in case of contagion

Any worker with symptoms of the COVID-19 should:

- Notify the supervisor that he/she is not fit to work
- Stay home for at least 14 days
- Maintain a minimum temperature control twice a day
- Report any person in his/her household of these symptoms and inform the supervisor
- Notify the doctor or health service if symptoms do not disappear or worsen.

Any personnel who is confirmed to be diagnosed with COVID-19 should report to the Health and Safety Advisor and the Manager on the site immediately.

Field Offices < 6 People and Field Monitoring

Requirements: In the general case that personnel are working and living in the same office, “work from home” is similar / same in terms of people as the office. In this case, personnel may continue to work in the office that they live in, however, “Reduced Contact Work” is advised. For field monitoring this involves:

- Ensure when visiting project sites, physical distancing is maintained.
- Avoid consultations, meetings, gatherings which involve a large number of people, beyond the government advice, both for organizing and being a part of. For essential business requirements, limit the number of people (below 10) ensuring physical distance.
- Minimize travel which requires personnel traveling in a partner's vehicle or vice versa. Ensure adequate measures are taken.
- Any discussions with home owners or contractors are outdoors, at 1 meter distance.
- Offices maintain the same protocols with washing hands prior to entry.

In case travel restrictions involve being restricted from any movement at all, personnel will be encouraged to work from home.

Short monitoring/handover missions (for multiple sites)

- Create clusters of 10/15 sites to visit. Sites should be geographically close and visitable in a one (long) day mission.
- Prepare maps of those clusters of sites, including travel distances.
- Prepare mission timetables with detailed timing for each activity (visit of site A, movement, visit of site B, etc.).
- Ask the contractor to submit pictures and videos of sites ready for handover in a pre-handover evidence folder of the team drive shared with the contractor.
- Review submissions in detail and pre-clear the sites ready for handover.
- Coordinate with the client and make precise appointments for handover activities, update the mission timetable according to availability of client's representatives.
- Arrange cars for standalone trips of our Site Supervisors (cars should be provided with water tanks, soap, sanitizer, PPE, lunchboxes, etc.).
- Brief and debrief our Site Supervisors prior/after each handover mission.

Template for Conditions of Contract

DIRECTION TO IMPLEMENT HEALTH AND SAFETY MEASURES - COVID 19 EPIDEMIC

Dear Sir

[insert name of contract] ("Contract")

This is a Notice served under Sub-Clause xxx of the Contract.

Taking into account the circumstances arising out of the Covid-19 pandemic, the Employer's Representative, hereby, instructs you to implement the Health and Safety measures that are listed in appendix 1 of this notice.

These measures are deemed to be reasonable precautions to maintain the health and safety of the Contractor's Personnel and as such are not additional to your existing obligations under the Contract and shall not be considered as a Variation.

The Employer's Representative also reminds the Contractor of its obligations under Sub-Clause 6.16 which states that:

In the event of any outbreak of illness of an epidemic nature, the Contractor shall comply with and carry out such regulations, orders and requirements as may be made by the Authorities or local medical or sanitary authorities for the purpose of dealing with or overcoming the epidemic.

The Contractor is required to submit evidence of its compliance with the above health and safety measures by **[insert date]**.

Yours faithfully

.....
[Employer's Representative]

Annex 16: Sample CODE OF CONDUCT

Global Compact: The Global Compact is a voluntary international corporate citizenship network initiated to support the participation of both the private sector and other social actors to advance responsible corporate citizenship and universal social and environmental principles to meet the challenges of globalization. All contractors and suppliers are strongly encouraged to actively participate in the Global Compact. The Code of Conduct addresses the issues included in the Compact in the areas of human rights, labor, environment and anti-corruption and interpretation of the Code should be undertaken in a manner consistent with the Global Compact. Suppliers interested in supporting the Global Compact and obtaining more information on the ten principles, can visit the Global Compact website at www.unglobalcompact.org.

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

1. Scope of Application:

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

2. Continuous Improvement:

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

3. Management, Monitoring and Evaluation:

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

Labour:

4. Freedom of Association and Collective Bargaining: It is expected that contractors recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to

bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

5. Forced or Compulsory Labor: It is expected that contractors prohibit forced or compulsory labor in all its forms.

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

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

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

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

Human Rights:

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

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

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

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

Environment:

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

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

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

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

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

Ethical conduct:

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

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

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

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

Annex 17: Sample Occupational Health & Safety Plan

Objectives of Plan

The Objectives of this plan are to adopt a positive Health & Safety Culture; adopt the principles of prevention to avoid risk, complete the project activities without incidents (zero fatalities, zero Lost Time Injury (LTI) or occupational illness).

The OHS plan covers the scope of works defined in the contract. This includes Preconstruction, Construction, Operation & Maintenance and Decommissioning phases.

Key Responsibilities

Involvement of all in implementing, maintaining and continually improving OHS processes is the key to successful completion and achievement of quality objectives set by the management. All project personnel of implementing partners that conduct construction works shall therefore be required to be familiar with the content of this OHS Plan and shall participate in implementing, maintaining and improving the management system.

It is the responsibility of the PIU Project Coordinator and all key personnel to ensure that the requirements for quality are fulfilled for works under their responsibility, cascading down to all implementing partners, as well as sub-contractors.

All relevant staff and Project workers are to be inducted into the requirements set out in this plan in general and into their function and responsibilities in particular.

Activity-Specific Project Manager Responsibilities

- Set good example in HSE issues.
- Ensure the availability of resources essential to establish, implement, maintain and improve the OHS Management System.
- Define, document and communicate roles, allocate responsibilities and accountabilities, delegating authorities, to facilitate effective OHS management.
- Ensure that all of the activities undertaken in the Project conform to Somali legislation and WB ESF.
- Review objectives achievements in a regular manner.

Activity-Specific Project Supervisors' Responsibilities

- Enforce all phases of the established HSE plan.
- Set good example in HSE issues.
- Prepare Job Hazard Analysis when required.
- Ensure the safety of all workers associated with the site.
- Conduct HSE inspections.
- Ensure workers are competent for their allocated tasks.
- Attend and participate in HSE meetings.

- Participate in accident/incident investigations.

Activity-Specific HSE Manager/Supervisor Responsibilities

- Prepare relevant OHS documentation and procedures.
- Monitor the efficient implementation of OHS requirements.
- Participate and organize the OHS risk assessments.
- Advise management of compliance and of conditions requiring attention.
- Conduct regular HSE inspections.
- Make thorough analysis of statistical data and inspections; delineates problem areas; and makes recommendation for solutions.
- Take part in the review of all OHS incidents and assist in investigating incident.
- Monitor the efficient implementation of the Project's OHS requirements.
- Organize the Project's OHS risk assessment exercises.
- Check on the use of all types of personal protective equipment specifies the use of appropriate PPE for the various work activities. Evaluates their effectiveness and suggests improvements where indicated.

Activity-Specific HSE Advisor Responsibilities

- Check on the use of all types of personal protective equipment specifies the use of appropriate PPE for the various work activities. Evaluates their effectiveness and suggests improvements.
- Conduct independent inspections to observe conformance with established OHS Plan and determines the effectiveness of individual elements of the plan (pre-task briefing, weekly toolbox talk, etc)
- Establish contact with Subcontractors with the objective of maintaining good relations and coordination of accident prevention activities and compliance with the established OHS plan.
- Correct unsafe acts and unsafe conditions.
- Deliver HSE induction/orientation course to all employees, including subcontractors.
- Deliver HSE awareness course and toolbox talk.
- Advise employees on OHS matters.

Activity-Specific All-Employees' Responsibilities

- Take all reasonable and practical steps to care for their own health and safety and avoid affecting the health and safety of co-workers and the general public.
- Follow all instructions and use the equipment properly
- Not interfere with any safety arrangements.
- Report any circumstances which may not comply with the project's OHS management system.

Competency

All personnel required to operate or work with any equipment or machine must be competent, be tested for each equipment that he/she shall be operating. All personnel who as part of their profession require

licensing or certification must obtain the necessary certification before he/she shall be allowed to work on the site.

Fitness

All personnel working on site shall be required to be certified medically fit to do so by an approved medical facility or Medical Doctor (pre-employment medical examination)

HSE Training, Induction/Orientation

Every new or rehired employee and sub-contractors' employees must undergo mandatory OHS orientation / induction. The purpose of the induction is to educate workers and make them aware of the major potential hazards he or she shall come into contact with while working on the site; also, it is one more opportunity to stress the importance of HSE being the first priority in the operations.

The content of the HSE orientation / induction shall cover the following subjects:

- Site safety rules.
- Personnel protective equipment requirements (PPE).
- Environmental sensitivity and protection.
- Preparation and planning of the job (daily pre-task talk).
- Emergency plan and muster points.

Sub-Project Specific HSE Training

In addition to the HSE orientation /induction, there shall be specific site HSE trainings which shall cover the following topics:

- Manual handling;
- Electrical Safety;
- Emergency Prevention, Preparedness and Response;
- Work at height training;
- First Aid training (for site First Aiders);
- Lifting and Rigging;
- Safe Driving techniques (for drivers)

Project HSE Risk Assessment

The project HSE risk assessment shall be developed and recorded. The Project's HSE risk assessment shall be conducted by a team consisting of HSE Manager/ Supervisor and technical managers/supervisors. It must be approved by the Project manager.

Fire Risk Assessment

A fire risk assessment shall be developed and recorded. A fire safety plan shall be in place in the site.

Job Hazard Analysis

Job hazard analysis is required when the hazards and risks associated with a specific task is to be identified so as to implement control measures. The HSE department together with the technical managers/supervisors shall develop a job hazard analysis when applicable.

Emergency Preparedness and Response

Emergency procedures and evacuation plan shall be developed by the HSE Department and displayed on the notice board. These procedures shall be communicated to all staff. Also each section/department shall have at least a trained first aider at all times.

HSE Implementation and Performance Monitoring

HSE Meetings

HSE management meetings shall be held once a month. The meeting is to help identify safety problems, develop solutions, review incident reports, provide training and evaluate the effectiveness of our safety program. Some of the meetings shall be:

- Project/Site Management HSE Meeting for management and supervision (Monthly).
- Tool box talk meetings for all workforce (Weekly).
- Pre-task briefing for all workforces (Daily).
- Special situation meeting (As required).

HSE

Reporting

All incidents and illnesses must be reported to site supervisor after which investigation shall commence and recorded so that appropriate corrective actions shall be implemented to prevent any re-occurrence and report findings shall be forwarded to management for review. Reporting requirements shall include notification of incident, investigation report, and monthly report. Notification of Incident form shall be developed which shall be filled and submitted to HSE department for investigation.

HSE Inspection and Audits

For continual improvement of HSE management system, HSE inspection and audit shall be conducted. An inspection checklist shall be developed. This is to ensure that the HSE management system is being adhered to. The inspection shall be conducted by the HSE department together with site management.

Corrective and Preventive Actions and Non Conformities

During the cause of inspections, concerns raised shall be addressed and closed out. It is expected that in a period of two weeks, a close out inspection shall take place to verify that the corrective actions have been closed.

Project HSE Rules

The project HSE rules shall be developed and supervision shall develop specific rules and procedures when necessary.

The following site rules shall be implemented at all times. The Site Manager shall draw these rules to the attention of their own workmen or staff. All sub-contractors must ensure that these rules are drawn to the attention of their workmen and staff.

The Principal Contractor may implement additional site rules during the contract programme. Any such additional rules shall be notified to all personnel engaged on the project prior to their implementation. The HSE rules shall include but not limited to:

- Personal Protective Equipment must be worn at all times.
- All instructions issued by the Site Manager regarding the storage, handling or cleaning of materials, plant and equipment must be followed.
- All vehicles must be parked in the designated areas.
- Any workman/women suffering from a medical condition that might affect his work and/or that could require specific Medical treatment must inform the supervisor before commencing work.
- All site tools shall either be battery operated or 110 volts.
- No one shall be permitted on site if it is believed that they are under the influence of alcohol or drugs.
- Vehicles must not reverse without a banksman in attendance.
- All visitors to site must undergo a site-specific induction and operative Identity badges must be worn at all times.
- All excavations must be secured.
- Smoking and eating shall only be permitted in the designated area. This area shall be identified during induction.
- No hot works operations are permitted without a hot work permit in place.
- There shall be no radios or other music playing devices on site.
- Good housekeeping practices to be adopted.
- Compliance with all Ethical Power Permit to Work systems
- The site keyed access procedure must be strictly adhered to.
- All Contractors must comply with Site Health & Safety Guidelines / Site Safety Method Statement
- No untrained worker shall be permitted to operate heavy machineries.

Safe Work Practices

Implementing safe work practices is one of the keys to achieving our HSE objectives and some of these safe work practices include:

Personal Protective Equipment (PPE)

The basic PPE required for the project shall be Safety Glasses, Safety Boots, Hand Gloves, Hard Hat and Coverall. Any other PPE shall be used as applicable. Management is responsible for the provision of PPE and usage shall be enforced at all time.

PPE shall be provided in circumstances where exposure to hazards cannot be avoided by other means or to supplement existing control measures identified by a risk assessment. An assessment shall be made to ensure that the PPE is suitable for purpose and is appropriate to the risk involved.

Information, instruction & training shall be given to all employees on safe use, maintenance and storage of PPE.

Employees shall, in accordance with instructions given, make full use of all PPE provided and maintain it in a serviceable condition and report its loss or defect immediately to the maintenance department where it shall be replaced.

PPE shall be replaced when it is no longer serviceable and returned on a new for old basis. Employees shall sign to state that they have received PPE when issued.

Welfare Facilities

The provision of welfare facilities on the site shall be communicated to all operatives at site induction. A cleaning regime shall be implemented and maintained for the duration of the construction phase to ensure the site welfare facilities remain in a clean and tidy condition.

If mains drinking water becomes unavailable during the construction phase bottled water shall be brought to site for all operatives for the necessary period.

Signage

Adequate provision for warning and directional signs shall be made.

Project HSE Procedures

OHS procedures shall be developed. Project activities shall generally be controlled in accordance with OHS Procedures. These procedures shall include:

- Lifting and Rigging Procedure
- HSE Reporting Procedure
- Working at Height Procedure.
- Emergency Procedure.

Annex 18: Stakeholder Consultations Undertaken

BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Engagements and consultation on the project design and the planned activities and implementation arrangements have been conducted with key institutional stakeholders including the relevant Government agencies, development partners such as UN agencies. Engagements and consultations have been held with key stakeholders identified (see below). Furthermore, community consultations have taken place through community representatives, such as CSOs and NGOs, as per World Bank guidance under the COVID-19 pandemic (see below).

Results of key institutional stakeholder consultations

The project team conducted a mission to engage with all relevant Ministries in the FGS in February 2020. Ministries were consulted and some key agreements were initiated, including over the location of the Project Implementation Unit (PIU) in the Ministry of Finance, as well as on the different capacities of other Ministries to act in advisory or consultative capacities. The project team further met with the governments of the project-affected Federal Members States (FMS) and with their relevant Ministries to discuss their roles vis-à-vis the project implementation at FGS level.

The project team further met with a series of UN agencies and entities. It was agreed that UNOPS would take on a support role in project management, located in the MoF. It further consulted agencies, such as UNICEF, FAO, and WHO on their current roles in flood risk management, locust response and general disaster recovery issues. It consulted with other international entities, including the BRiCS Consortium, SomRep, as well as bilateral partners on potential support as well coordination in disaster recovery.

Key concerns of the collaborating Ministries revolved around the development of capacity of these agencies to support project implementation and in particular fiduciary and safeguards capabilities. The project team agreed that there would be a component on capacity development and strengthening. Concerns on the project footprint in the face of widespread need were discussed and it was agreed that the project targets the three flood-affected states of Hirshabelle, South West, and Jubaland, while advancing a national approach to the locust response, longer-term resilience building, and the health CERC.

To avoid the risk of elite capture, SCRP seeks to exclusively benefit highly vulnerable groups, as the crises has had a disproportionate impact on women, girls, children, the elderly, disabled people and internally displaced persons (IDPs). In the course of the Project, consultations will be carried out with vulnerable groups to identify and address their unique needs, including the use of sex-disaggregated surveys and focus groups, and vulnerability-based selection criteria to prioritize their inclusion as project beneficiaries.

It was also agreed that targeting under the Project will be informed by the inter and intra sectoral distribution of needs identified under the FINA, and further refined through a process of systematic and criteria-based sectoral and geographic prioritization, temporal sequencing and investment planning; to be discussed and validated at the community-level and defined in the Project Operations Manual (POM).

This methodology will also carefully consider clan dynamics in facilitating or hindering project implementation.

Results of community consultations

In addition, given the current COVID-19 pandemic, the PIU has followed the World Bank's guidelines on stakeholder consultations under the pandemic, and conducted community consultations through CBO and NGO proxies. A set of CSOs and NGOs were selected that operate in the different thematic areas covered by the Project, and that represent the voices of different community groups. These included CBOs and NGOs working in the health sector, in the agricultural sector, on community development, and such that work specifically with women, youth, IDPs and other vulnerable or marginalized groups. During the skype interviews, the CSOs and NGOs provided valuable insights and inputs into different Project components and activities, as well as into proposed risks and impacts and risk mitigation measures (see questionnaire in annex 3). Some organizations articulated additional risks and impacts, as well as mitigation measures.

All NGOs and CBOs broadly welcomed the project activities as timely and necessary.

In regards to health- and COVID-19-related activities, organizations pointed out that IDPs are a key vulnerable group, and efforts should be made to provide them in particular with health centers and other COVID-19-related services. As living spaces are more crowded, IDPs are more susceptible to the virus, as well as other health conditions. Generally, COVID-19 activities would be best placed to cover health centers that operate 24 hours, including emergency response teams, training of health workers to improve their knowledge and skills, and personal protective equipment.

One key risk mentioned in regards to the COVID-19 activities was that logistics can be impacted by the security situation and that transport of health equipment, medication and other goods to remoter health centers may be a challenge due to Al-Shabaab presence. This may raise the costs of the goods significantly.

Another risk that respondents pointed out was the fear that procured goods or medicines, including those obtained overseas, may lack in quality. It was suggested that during the procurement process, quality of the procured items needs to be assured, and any other misconduct - including corruption - avoided. Similarly, misappropriation of the support to non-target beneficiaries must be avoided. It was also pointed out that health facilities, once equipped, also need to scale up the quality of their service delivery and staffing. In general, several risk mitigation measures against corruption were suggested, including a strong GRM.

It is broadly acknowledged that GBV has become a serious challenge in Somalia and that the numbers of reported cases have risen sharply. Prevention and responses to GBV therefore have to be integrated well into the Project. Interviewees pointed out that GBV responses should include survivor-centered approaches, allowing the survivor to access all required services on her/his own terms.

However, as some respondents pointed out, even by consulting GBV survivors, people may already be put at risk. They pointed out that people are often scared to even talk about cases, as they think that the Project workers will disclose the information, or that reports will be made to the local police and someone may get prosecuted – which would then bear other social consequences for the survivors and her/his family. People would be afraid of retaliation from the group of the perpetrator for reporting a case. This

bears the necessity of solid training on GBV for project, and in particular GRM staff. Consulted organizations working in the GBV field, pointed out that one mitigation measure is to ensure that communities understand that GBV cases are serious issues, and the Project should raise sufficient awareness to that regard.

Other challenges include that there are often no resources to actually guarantee access to all referral services for a survivor. For example, there may be no transportation available for a survivor to travel to one of the referral service centers. There are often also no ambulances available, that could pick up seriously injured survivors and transport them to a health facility.

Some pointed out that construction work can come with its own GBV/SEA risks and challenges. Usually local community members are very interested in obtaining small jobs at construction sites, as it is an unexpected access to work and resources. But often not everyone can obtain a job. This means that favours can be exchanged, especially with female workers, to grant deployment on the construction site. Other risks included the potential of sexual exploitation and abuse during the identification of beneficiaries. Clear processes of beneficiary selection, or community-based processes are therefore highly important and were suggested as mitigation measures. Another issue is the insecurity at night that comes with empty construction sites. Often everyone goes home, and companies do not employ watchmen. Women can then be taken to these empty and unprotected sites. The Project's GBV/SEA Action Plan provides strong mitigation measures for such cases.

Asked about the gaps in referral services, interviewees from Baidoa / SWS pointed out that the biggest gap is in access to justice and legal aid/assistance. The Judiciary was names as the key missing area. In other areas, such as Lower Shabelle, there are not services available, and all survivors need to be taken out and brought to Mogadishu. Generally, however, it was pointed out that even where services are available, people are often so poor and destitute, that they cannot afford anything. Some survivors are traumatized, and their families have no capacities to help.

Armed personnel, from Government forces to local militias or even Al-Shabaab, were mentioned as a key threat to women. Often development projects are embedded in tensions between Al-Shabaab and the Somali Government – especially in some of the remote areas where disaster activities need to be implemented. This can make project staff or beneficiaries a potential target. In addition, Projects therefore often send out armed personnel to protect their Project assets and staff. Armed personnel, however, can pose a threat to women too.

In regards to WASH activities, respondents pointed out that community awareness about the distribution and the items are key. They emphasized that communities can be suspicious, and need to be explained what items should be used for, and who gets to benefit. They may think that food is being distributed, or cash is being given. Especially hygiene promotion can be supported through community health workers, or through media in order to create awareness. Good means of communicating issues like this are radio and banners. Some organizations suggested billboard, which they have used for COVID-19 messaging.

Hygiene promotion is particularly important for IDP communities. IDP camps are often not very clean, and women and children in particular would benefit significantly from a cleaner and healthier environment. IDPs often have lacking access to water, and have a large number of people living in a confined space. For example, six people may share one room. That in and itself causes health challenges – especially during the COVID-19 pandemic.

Other WASH-related risks that were named in the consultations concerned the lack of access to service providers and the general lack of access to information. This is important if WASH facilities are to be used appropriately, otherwise they can pose risks (e.g. crowding at waterpoints during COVID-19).

There was general agreement among the consulted organizations that disaster mitigation, including floods droughts and locusts, must be led from a federal level, as local level entities do not have appropriate capacities. One interviewee described how important it is that nationally driven activities are triggered down to the local levels. At the local level itself, people are local governments are powerless, lack knowledge and funds, in addressing some of the disasters. Only one respondent felt that chemical controls of issues such as the locusts may be risky, and that traditional local approaches of locust control should be applied. However, the interviewee agreed that in regards to expansive flood areas, localized measures are not sufficient for control.

In regards to Cash for Work activities, interviewees agreed that IDPs and women are among the vulnerable populations that should be provided with opportunities. IDPs, women and youth can be tasked to clean IDP camps to also create healthier and cleaner environments. While all IDPs can be considered vulnerable, consulted organizations pointed out that some IDPs, those who have been displaced multiple times, face even more hardships than other IDPs, and should therefore be targeted as beneficiaries of project activities. Several interviewees also emphasized youth as a vulnerable group that should be focused on with Cash for Work activities.

Concerning key risks of Cash for Work activities, it was mentioned that cash can be handled in a poor way and can be diverted. Mitigation measures are the transfer of payments from account to account, through checks signed by multiple signatories for accountability purposes. Furthermore, cash may be used for unintended purposes by the legitimate recipients. Mitigation measures can include awareness sessions on what the cash should be intended for, more focus on women beneficiaries who are more likely to spend the money on the family, or food items instead of cash.

Farming inputs through the Project need to consider the status of many farmers. For example, there is a close link between IDPs and farming. Most of the displaced people are from the rural country side, and they are farmers. Some of them are displaced from areas that are very close to their camps. Some of their family members remain therefore in the IDP camps, and some remain in farming areas, for seasonal farming. The lockdown as a response to COVID-19 has had a tragic effect on many of those farmers. Town inhabitants and IDPs lost their livelihoods, as they had no access to their farms outside of the cities or towns.

Other key issues for agricultural growth is the water scarcity, as well as the lack of capacity in rural agricultural communities. There is substantive need for good training of farmers, and good agricultural practices. Seed inputs should be certified, and where they are not (and often un-certified seeds come from donors), the farming outputs are not safe and prone to insects or diseases. Where donors buy the seeds at the local market, which are often not of high quality, money maybe wasted. A proven approach to assistance in farming is to work through cooperative rather than individuals.

The most significant risk for farmers and farming inputs, according to the respondents, is Al-Shabaab and the resulting insecurity. As most of the farming areas are located outside of the cities, lands can be very close to Al-Shabaab. Farmers are likely to have no protection or power in any way. This means that Al-

Shabaab can force communities to provide them with payments, threatening them with being killed. Al-Shabaab may also raid farmers for their own benefits of agricultural inputs. The Project's Security Management Framework will allow for the development of local context-specific Security Management Plans (SMPs) that will focus on such issues and aim to mitigate these local security risks.

Some interviewees responded to labor-related risks. For example, in their experience women and youth are selected for daily labor works on local construction sites. However, because they don't understand their rights, they are often abused, they are paid low wages compared to others. Construction companies may rely on the fact that they are vulnerable and needy. Those laborers are also often not very protected from injuries at construction sites. Work norms further don't necessarily respond to women's needs or those of other vulnerable groups. Particular attention needs to be paid to those groups of workers, with details spelled out in the Labour Management Procedures (LMP).

IDPs were pointed out as particularly vulnerable group a number of times during the consultations. Contributing to their challenges is the fact that populations in town are generally increasing. This leads to conflicts over land or the use of farming crops, availability of jobs etc... IDP camps are thereby ruled by gatekeepers, that can pose a challenge to fully convey development funds and support to IDPs. The needs of the IDPs, on the other hand, place a heavy burden on the host communities, as sometimes IDPs are prioritized, while host communities are similarly in need; or IDPs put a heavy burden on the existing services.

One key risk that was flagged in view of the Project's community infrastructure activities was the lack of quality and design in many infrastructure buildings. Often engineers lack information on the local soil and rocks, and they construct buildings in places where they will soon collapse given the wrong ground conditions. Or, there is a lack of awareness of the flood conditions, and the annual floods destroy new infrastructure that was built in the wrong place. As mitigation measure it was suggested to involve communities in the implementation of infrastructure projects, to allow them to proceed in an accountable and transparent manner.

Organizations were also asked how the Project should best consult and disseminate information on its activities. Respondents proposed that young people are best reached by telephone. A lot of different youths come from different villages, have relatives and friends, and can call them and ask information. That way, consultations can reach considerably far in case of need. Furthermore, vulnerable groups are often organized in associations (youth associations, disability associations, etc.). They exist at the community level and can create excellent opportunities to consult specific vulnerable groups.

Annex 19: Stakeholders Consulted

Stakeholder	Date	Participants
Ministry of Finance (MoF)	February 15-24	<ul style="list-style-type: none"> Ali Haji Aden (PIU Coordinator) Eng. Abdirinur Ali Farah Amir M. Sirad Abdinasir M. Aden (FM) Fatima Abdirahman Ahmed, (Procurement)
Ministry of Planning, Investment and Economic Development (MoPIED)	February 15-20	<ul style="list-style-type: none"> Asad Yusuf Muse Mohamed Osman (DG) Abukar Y. Sanei
Office of the Prime Minister (OPM)	February 15-20	<ul style="list-style-type: none"> Muhumed Hussein Abdurahman Sharif Sharmarke M. Farah Zainab Elumi Abdifatah Abdinur
Ministry of Humanitarian Affairs and Disaster Management (MOHADM)	February 15, 20, 2020	<ul style="list-style-type: none"> Khadar sh. Mohamed Abdikhafar Yaqob Abubakar Abdiwali Suleiman Abdi Zahra Abdi Mohamed
Ministry of Agriculture & Irrigation (MoAI)	February 16, 18, 20, 2020	<ul style="list-style-type: none"> H.E. Dr. Said Hussein Iid (Minister) Mohamed Mohamud Abdi Eng Mohamed Abdi Gurey Mohamed Muse Abdi Ahmed Keinan
Minister of Livestock, Forestry And Range (MoLFR)	February 16, 20, 2020	<ul style="list-style-type: none"> Abdullahi Araye Addow Abdirahman Nur KeiliF
Ministry of Energy and Water Resources (MoEWR)	February 16, 20, 22-25, 2020	<ul style="list-style-type: none"> Eng. Ahmed M. Hassan Ali Mohamed Hersi
Ministry of Women & Human Rights Development (MoWHRR)	February 18, 2020	<ul style="list-style-type: none">
Ministry of Public Works, Reconstruction & Housing (MoPWRH)	February 16, 20, 2020	<ul style="list-style-type: none"> Abdullahi Ahmed Sh, Abukar
Ministry of Transport & Civil Aviation (MoTCA)	February 16, 20, 2020	<ul style="list-style-type: none"> Liban Mohamed
Hirshabelle Ministry of Planning and International Cooperation	February 17, 2020	<ul style="list-style-type: none"> H.E. Abdirahman Abdullahi Moallim (Minister) Abdirizak Gedi Prof. Osman Banl
South West State Ministry of Investment and Economic Development	February 17, 2020	<ul style="list-style-type: none"> H.E. Ahmed Madobe (Minister)
Jubaland Ministry of Planning and International Cooperation	February 17, 2020	<ul style="list-style-type: none"> Abdirlahid (DG) Osman Hassan Abdi
United Nations Office for Project Services (UNOPS)	February 15-20	<ul style="list-style-type: none"> Tim Lardner (Country Director) Ljubica Butkovic (Partnership Specialist) Sayed Mohammad Farooqui

United Nations Children's Fund (UNICEF)	February 18, 2020	<ul style="list-style-type: none"> Sara Karimbhoy Melanie Galvin Brandon Ross Hailey Einas Mansour
United Nations Food and Agricultural Organization (FAO)	February 14, 19, 2020	<ul style="list-style-type: none"> Etienne Peterschmitt (Country Representative) Abdi Aden Mohamed Andrew Lanyan Mohamed Shirdim Ugo Leonardi Abdoul Karim Bah Ezana Kassa Daniel Molla Christopher Print
United Nations Development Programme (UNDP)	February 18, 2020	<ul style="list-style-type: none"> Abdul Qadir
World Health Organization (WHO)	February 16, 2020	<ul style="list-style-type: none"> Malik Sk Md Mamanur Debesay Mulugeta Defreitas, Kyle
United Nations Office for Coordination of Humanitarian Affairs (OCHA)	February 19, 2020	<ul style="list-style-type: none"> Justin Brady (Head of OCHA)
Building Resilience in Central Somalia (BRICS)	February 17, 2020	<ul style="list-style-type: none"> Martijn Goddeeris (BRCIS Chief of Party) Victor Moses (Country Director, Norwegian Refugee Council) Andrea Solomon, (Acting Country Director, Concern World Wide) Haron Emukule, (WASH engineer, Concern World Wide) Barnabas Asora, (Programme Director, Norwegian Refugee Council) Abukar Mohamud, (Deputy Country Director, International Rescue Committee) Ahmed Omar (Head of Southern States, Save the Children International) Kassim Hish: Education specialist, (Save the Children International)
Somalia Resilience Program (SomRep)	February 19, 2020	<ul style="list-style-type: none"> Kevin Mackey
Department for International Development (DfID)	February 19, 2020	<ul style="list-style-type: none"> Jake Peters Seb Fouquet
Swedish International Development Cooperation Agency (SIDA)	February 18, 2020	<ul style="list-style-type: none"> Bilan OsmanJama

Date	Name of Organization	Field of Work	Geographical Coverage	Point of Contact
------	----------------------	---------------	-----------------------	------------------

9 July 2020	Health and Nutrition Organization (HANDS)	Health, Nutrition, Community resilience, livelihood, agricultural production	IDPs Bay and Bakool, Lower Shabelle (SWS)	Adan Hussein Hands.org1@gmail.com +252615502552
10 July 2020	South West State Youth Vision (SWYV)	Women, IDPs, youth	Baidoa (SWS)	Nasra Abdulahi Abdinur nasraabdullahi31@gmail.com
10 July 2020	CSET Group – Center for Seeds	Agriculture, Farmers	SWS, Lower Shabelle, Bay and Bakool, Gedo, Bardhere, Middle Shabelle	Dr. Khalid Omar Ali, CEO, coe@cset.so , +252615562894
10 July 2020	Somali Sustainable Development Organization (SOSDO)	Agriculture and fishery, transition from humanitarian assistance to development	Hirshabelle, SWS, Southern-Central Somalia, Garowe, Jowhar, Mogadishu, Kismayo and Baidoa	Abdulahi Abdulkadir Haji Dahir soorey55@gmail.com
10 July 2020	Open Governance Network	Governance, elections, vulnerable groups	Mogadishu, Middle Shabelle and Lower Shabelle	Ahmed Ali Mohamud Gacal ahmedgacal85@gmail.com +252 61 5887740
12 July 2020	ARD - African Relief and Development	Community development, drought resistance	Bay and Bakool	Hassan Gedi ard.relief@gmail.com
12. July 2020	Social-life and Agricultural Development Organization (SADO)	Health, livelihoods, agriculture, GBV, conflict management	Bardhere, Juba River, Dolow, Kismayo - Jubaland	Ibrahim Mohamed Diriye idiriye@sadosomalia.org
16 July 2020	Nomadic Assistance for Peace and Development (NAPAD)	Livelihoods, WASH, agro-pastoral issues, women and IDPs	Gedo	Abdullahi Hersi Abdullahi.hersi@napad-int.org

Annex 20: Grievance Redress Mechanism (GRM) Compliance / Existing GRM of Implementing Partners (IPs)

The Checklist will assist in assessing IP GRMs and their compliance with the SCRP GRM. If the PIU assesses the IP's GRM as compliant with the SCRP GRM, the IP may continue to implement its own GRM system. Prior or after contracting, the IP (with assistance of the PIU Social Specialist) will fill in the GRM Checklist. The Checklist will then be reviewed by the PIU Social Specialist, and, if necessary, a) the IP will be asked to fill gaps in its in-house GRM; b) the IP will be asked to implement the SCRP GRM. In cases where the IP GRM is found to be compliant, the PIU will provide a no-objection to the IP.

Name of Implementing Partner: Date: Name of Respondent:				
No.	Criteria	Yes	No	Comment/ Explanation
General GRM				
1.	Does the IP have clear, formal, and transparent internal mechanisms (e.g., a grievance redress unit, grievance redress committees, designated grievance redress officers) and rules for addressing grievances?			
2.	Does IP staff responsible for grievance redress have the authority to take or demand remedial action?			
3.	Are IP staff responsible for grievance redress obliged to take action on all grievances?			
4.	Do project-affected people feel that they can lodge grievances without fear of retaliation?			
5.	Are project-affected people aware of their right to file a grievance and of the grievance redress process in general?			
6.	Do clear mechanisms of communication exist for potential users of the GRM on the existence and processes of the GRM?			
7.	Does communication material exist for the general public (what kind of material is it? How is it disseminated)?			

8.	Are there internal processes in place to record, track, and monitor the grievances and the action taken on them?			
9.	Does the GRM provide timely feedback (written or otherwise) to the aggrieved party on actions taken?			
10.	Is a system in place to keep complainants informed with status updates?			
11.	Is there a 2 nd Tier / appeals process in place that GRM users can access if they are not satisfied with how their grievance has been resolved?			
12.	Do multiple grievance uptake locations exist?			
13.	Do multiple grievance uptake channels exist (what are they?)?			
14.	Is there a fixed service standard for grievance resolution?			
15.	Do clear grievance processing guidelines exist?			
16.	Does the GRM contain the typical GRM value chain (Uptake, sort and process, acknowledge and follow-up; verify, investigate and act; monitor and evaluate; provide feedback			
17.	Does a process for periodic evaluation of the GRM logs/data exist that informs proactive actions to stem complaints and grievances?			
18.	Do procedures exist for protecting confidentiality of complainants (anonymous complaint) – applicable to workers grievances and GBV/SEA complaints as well?			
	GBV / SEA / SH Mechanisms			
19.	Are multiple channels to report GBV-related grievances available to a survivor?			
20.	Are all GBV/SEA/SH grievance recipients well trained in providing appropriate responses to survivors?			
21.	Does the response system allow linking the survivor and GBV service providers?			
22.	Does the response system allow linkage to the domestic legal system?			
23.	Does the IP allow a dedicated team to determine the likelihood that an allegation is related to a World Bank-financed project?			
24.	Is the GBV/SEA/SH response system survivor-centered?			
25.	Is the GBV/SEA/SH response system based on informed consent of the survivor?			
26.	Are complainant records collected and handled by trained qualified staff?			
27.	Are complainant records safely stored?			
	Workers' Grievance Redress			

28.	Does the IP request every worker to sign a Code of Conduct with reference to Labor Act and GBV/SEA?			
29.	Does the IP request every sub-contractor to request from its workers to sign a Code of Conduct with reference to Labor Act and GBV/SEA?			
30.	Does the IP and its sub-contractors have a defined workers' grievance redress system?			
31.	If a workers' GRM exists, is it separate from the mainstream Project GRM?			
32.	Are all workers (including from sub-contractors) are inducted on workers' grievance redress mechanism?			
33.	Does the workers' GRM cover all types of workers?			
34.	Does the IP have 2 nd Tier / Appeals mechanism in place where workers can report their case beyond their employer?			
35.	Is the IP and its subcontractors able to furnish records of all workers' grievances and provide them to the PIU?			
36.	Measures in place to protect workers against reprisal for use of GM			

Annex 21: IP Capacity Assessment Form

This ESMF has been amended to include this capacity assessment form. The first few months of project implementation have shown that IPs have varying capacities to implement all necessary E&S risk mitigation measures and to fully comply with the SCRP's E&S instruments. The PIU will therefore need to assess the capacity of each IP to implement the Project's E&S requirements and to be able to fully comply with the Project's E&S instruments.

In order to assess IPs' capacities, the PIU Social Specialist will administer this capacity assessment form. Prior to contracting, the PIU will meet with the respective IP and will ask the IP the questions listed in the below form. The PIU will then assess whether the IP will be able to fully comply with the Project's E&S instruments or whether additional staff is required or capacity building activities will need to be undertaken. The PIU will then request the IP to budget accordingly in its project proposal, while the PIU will prepare and implement a capacity building plan for the IP.

Name of IP	Agency has procedure (obtain copy)	Agency has generic script (obtain copy)	Agency has unwritten process	Staff/consultants assigned to task (obtain TORs/job descriptions of relevant staff)	Specified timeframes associated with task	Other related notes
Environmental and social screening and scoping						
Development of environmental assessments/plans						
Development of social assessments/plans						
Monitoring and supervision of E&S						
Stakeholder engagement (implementation requirements for GRM, SEP, LMP, ESMF)						

Grievance mechanism						
GBV/SEA/SH						
Child protection						
E&S information						
E&S disclosure						
Feedback						
Worker environmental health and safety						
Code of Conduct						
Workers' Grievance Mechanism						
Protection of Project workers (e.g. vulnerable workers, such as women, persons with disabilities)						
Freedom of association and collective bargaining of project workers in a manner consistent with national, and or international law						
Incident reporting						
Child protection procedures (e.g. age verification procedures)	Open ended questions to further understand E&S capacity					

How is environment and social risks incorporated in the organization? (seek to obtain organizational organogram reflecting E&S)

What is the assigned staff experience related to environmental and social management? (obtain CVs of relevant staff)

What is management oversight and approval of environmental and social risk and impact?

What are the reporting lines related to environmental and social management of risk and impact?

What are additional quality assurance or control systems related to environmental and social management?

What training opportunities is available in regards to environmental and social risk and impact?

What is the budget allocation to manage environmental and social risk and impact under the SCRP?

Do you have sufficient funds/staff to screen, scope and develop site specific plans? (if possible, how many fulltime/part time; geographic location of staff; m/f)

Is there flexibility within existing sub-project to respond to unexpected management of environmental and social risk and impact?

Do you have sufficient capacity in the organization to manage environmental and social risk and impact within the SCRP activities? (number of staff, time allocated, experience - check against all relevant risk mitigation measures that have to be undertaken - see reporting format for IP

What are your concerns in regards to management of environmental and social risk and impact?

<p>Key Assessment Findings</p>	
<p>Recommended Actions (fully adopt IP system, fill existing gaps, etc...)</p>	
<p>Date of Assessment</p>	
<p>Name of PIU Staff conducting the assessment</p>	