



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Somalia	AFRICA	P173315	
Project Name	Somalia Crisis Recovery Project + COVID-19		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	4/10/2020	5/15/2020
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance, Federal Government of Somalia	Ministry of Finance, Federal Government of Somalia, Ministry of Planning, Investment and Economic Development, Federal Government of Somalia		

Proposed Development Objective(s)

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

Financing (in USD Million)	Amount
Total Project Cost	107.50

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The Somalia Crisis Recovery Project responds to the worst flooding in the Somalia's recent history which impacted the country in late 2019. The flooding affected 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. In addition,



wet soils have supported the uncontrolled development and spread of Desert Locusts across Somalia and much of East Africa which threaten food security and livelihoods. Through an emergency and early recovery component the Project will limit locust proliferation and reduce impacts, whilst providing immediate and integrated livelihoods and basic services support to flood-affected people. Medium term activities will focus on support the rehabilitation of critical public and community infrastructure in line with build-back-smarter and climate resilient standards, whilst longer term activities will lay the analytical and policy groundwork to enable a government-led, integrated approach to flood and drought risk management.

The PDO will be achieved by targeting: (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; (d) developing sustainable institutional models for crisis recovery and preparedness through public sector-civil society collaboration; and (e) a health CERC.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
All flood recovery activities will be limited to the three flood-affected states of Hirshabelle, South West, and Jubaland, targeting 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. The locust response and CERC component will be national in scope and similarly, activities funded under component 4 for longer term disaster management and preparedness, such as integrated flood/drought response and operationalization of the RRF Secretariat will have a national focus. Targeting under the Project will be informed by the inter and intra sectoral distribution of needs identified under FINA, and further refined through a process of systematic and criteria-based sectoral and geographic prioritization, temporal sequencing and investment planning. Such processes will follow an iterative process of top-down criteria setting and bottom-up demand determination held together by a structured consultative process. A database on potential beneficiary targets will be developed by implementing partners to identify targeted beneficiaries in line with centralized project-specific targeting and information management systems. Project resource allocation to the states will be determined progressively based on specific criteria, including implementation progress against the previous work plan and compliance with safeguards and fiduciary standards. Where geographic expansion of the proposed activities (not the introduction of new activities) is envisaged, the project-specific E&S context will be further reviewed.

The Project's early recovery and locust prevention and response 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 and strengthening Somalia's Integrated Disease Surveillance and Response System and enhancing laboratory capacity to ensure the timely detection of pathogens (including for COVID-19).

Component 2 of the project will support the rehabilitation of critical public and community infrastructure 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 (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 of the project will set the analytical and policy groundwork and capacities to enable a government-led, integrated approach to flood and drought risk management and preparedness and will include management plan for Juba and Shebelle Rivers; regional dialogue on river basin cooperation; a study of critical water management infrastructure for flood risk reduction for Beledweyne, flood risk reduction interventions for Beledweyne, such as urban planning and community engagement as a national pilot; and technical assistance for integrated flood risk management capacity of Federal and state government sharing Beledweyne challenges and experiences. It will supporting the setting up of a National Emergency Operations Centre (NEOC) using a systems approach, and developing and operationalizing a Longer-term Public-Civil Society Collaboration Model for Crisis Response and Preparedness; establish a locust early warning systems, and; strengthen Somalia’s Integrated Disease Surveillance and Response System and enhancing laboratory capacity to ensure the timely detection of pathogens (including for COVID-19). This would entail support to developing Somalia’s in-country laboratory capacity including rehabilitating facilities based on needs identified in the laboratory systems assessment. Key activities will include establishment of a national level referral laboratory and development of linkages between laboratories within Somalia and external laboratories including laboratory training, equipment and supplies, staffing, material / guideline development, and logistics. Component 3 will also support activities to build Government’s surveillance, monitoring, and emergency response capacity at the Federal, State, and regional level including intensive twinning, organizational development, and training. Development of comprehensive surveillance guidelines and biohazard guidelines may be included as well as formal training activities such as the field epidemiology training program.

Component 4 on Project Management 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 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) procured by the PIU will validate results. The PIU is expected to provide close implementation support to the FMS and state level project teams by engaging a technical advisory consultancy.

Component 5 will be a Contingency Emergency Response Component (CERC) that will provide support mitigation and response of an outbreak or health crisis. The CERC will serve as a first-line financing option during an eligible emergency response. In addition, country IDA funding that has not been used could be allocated to this component in the case of an emergency

D. 2. Borrower’s Institutional Capacity

The capacity of the client to identify, understand and manage adverse environmental and social impacts and risks on the project is weak. This includes capacity for monitoring of environmental and social risks and impacts and redressing these impacts where harm has occurred.

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 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 State Project Teams where necessary. UNOPS will also provide on-the-job training and skills acquisition to the PIU, State Project Teams, and the FMS MDAs on procurement, contract management, environmental and social safeguards, monitoring, evaluation, and reporting, engineering, GBV, and grievance redressal. The PIU has designated a focal point on environmental and social safeguards and has commenced the procurement of dedicated environmental, social, and GBV experts. Through the engagement of UNOPS significant capacity gaps for application of risk mitigation protocols and monitoring of impacts for environmental and social harm will be plugged. In addition, the capacity of MoHADM will be progressively developed throughout project implementation.

It is likely that the FGS will contract the FAO for locust mitigation and response activities. For the planned rapid response to locust crisis component, a comprehensive Pest Management Plan (PMP) that will outline the various elements and actions needed to be taken to adequately address the operations environmental and social concerns during project implementation will be prepared and disclosed before project activities kicks off. The PMP will address: Pest management approaches, Pesticide use and management, Policy, regulatory Framework and institutional capacity, and Monitoring and evaluation. FAO Directives on Desert Locust Control is sufficient to fully meet the banks Operational Policy requirements on Pest Management and will be integrated in the PMP. FAO will also support Government to responsibly handle and administer pesticide, reduce the associated risks and assess the positive and negative impacts of control interventions. This includes training and setting up basic facilities to monitor and address any issue that may arise from the control campaign, in line with FAO's Desert Locust Guidelines on Safety and Environmental Precautions. FAO will also support government to follow appropriate product and container disposal guidelines and provide environmental impact assessment kits. The project will also work in parallel with other regional locust interventions activities to share knowledge base and linkages to avoid duplication and maximize sharing of resources.

At the federal level, the Project will be overseen by a Project Steering Committee chaired by the OPM and include representation from the Federal MoPIED and MOF who also will co-manage the Project PIU. 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 Project Board 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 period 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.

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, a state-level extension of the PIU, the SPT is proposed as a “light” structure in each Project state, likely to be housed in state MoPIEDs or offices of the heads of states (as determined by each state), serving primarily as a ‘node of convergence’ at the state level. They would be 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 STP will be responsible for district-level community consultations and raising awareness of the project in their communities through strategic communication.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

High

Environmental Risk Rating

High

Environmental risk classification of the project is High. Component 1 of the project planned support for a rapid response to the desert locust crisis through surveillance, ground and aerial spraying operations activities poses 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 select 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 component 2 and 3 activities associated with the small to medium scale civil works entailing rehabilitation and reconstruction of community infrastructure such as damaged transport infrastructure, municipal Water Supply and Sanitation Schemes, Water Resources and Flood Risk Management Infrastructure, Restoring irrigation schemes in support of agrarian livelihoods, damaged schools, and damaged health facilities and laboratory capacity including rehabilitating 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.

Environmental risk and impacts are also anticipated under component 3 activities providing support countries laboratory capacity including rehabbing facilities, laboratory training, equipment and supplies, staffing, material / guideline development, and logistics. Risks associated with these activities relate to the handling and disposal of hazard/medical wastes and limiting the spread of communicable diseases e.g. Covid 19 through health provision and small-scale civil works E&S related risks. Other Component 3 project activities do not pose risks, since they relate to technical assistance, capacity building and training.

Public Disclosure



Social Risk Rating

High

The social risk rating has been classified as high. Whereas project activities are expected to have substantive positive impacts, there are adverse residual risks. Project activities associated with key social risks and impacts are; a) foreseen low-to-medium-intensity civil work activities on reconstruction and rehabilitation of physical and community infrastructure; b) displacement impacts resulting from involuntary resettlement for activities under component 1,2&3, and; c) the use of cash for work transfers, an intervention susceptible to diversion and leakages.

Potential social risks and impacts are; a) ensuring security for project operations including the protection of project workers, beneficiaries and affected persons; b) 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; c) selection bias and 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; d) challenges in access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring; e) 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, e) Communities exposure to health problems arising from risks of ineffective infection control and inappropriate healthcare waste management and; f) systemic weakness as the capacity of the PIU to identify, understand and prevent adverse social impacts on the project is limited

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The project would benefit rural and flood ravaged areas and populations most affected by the drought, floods and locust infestation, including farmers, agropastoral, pastoralists and rural IDPs through recovery infrastructure and crisis response activities such as livelihoods protection and WASH restoration. The investments would also provide substantial climate co-benefits through the rehabilitation of critical infrastructure and services helping improve the capacity of vulnerable populations to cope with climate-induced stressors and designing investments in a resilient manner that adapts to changing climate conditions.

Component 1 anticipated E&S risks and impacts of the project are associated with the ground and aerial spraying operations and protection of livelihoods through the provision of farming inputs to locust-affected vulnerable households. Environmental risks and impacts for these activities will be mitigated by a Pest Management Plan (PMP). PMP will outline the various elements and actions needed to be taken to adequately address the operations environmental concerns during project implementation. The PMP will be finalized and disclosed prior to disbursement of component 1 activities and will address: Pest management approaches, Pesticide use and management, Policy regulatory Framework and institutional capacity, and Monitoring and evaluation. FAO Directives on Desert Locust Control is sufficient to fully meet the Banks ESF Policy requirements on Pest Management (as per



ESS3) and will be integrated in the PMP. FAO will also support Government to responsibly handle and administer pesticide, reduce the associated risks and assess the positive and negative impacts of control interventions. This includes training and setting up basic facilities to monitor and address any issue that may arise from the control campaign, in line with FAO's Desert Locust Guidelines on Safety and Environmental Precautions. FAO will also support government to follow appropriate product and container disposal guidelines and provide environmental impact assessment kits. For retroactive financing, only procurement of biopesticides will be financed and spraying activities that have already occurred will not be covered. Procurement of biopesticides will be done in line with ESS3 and FAO's guidelines for procuring and managing pesticides, whichever is the most stringent, and will only be used in line with approved PMP. Screening will be done for pesticide to be procured through retroactive financing. The project will also work in parallel with other regional locust interventions activities to share knowledge base and linkages to avoid duplication and maximize sharing of resources.

Component 1 Social risks and impacts include; a) exclusion of truly vulnerable, marginalized and minority members of the community amplified by limited resources against widespread need and weak formal redress systems; b) selection bias and elite capture where project benefits are diverted to ineligible and less-deserving locations and individuals at the expense of locations most ravaged by locusts; c) difficulty in access to beneficiaries for meaningful stakeholder and community engagements as well as effective grievance redress and monitoring; d) ensuring security for project operations especially in the distribution of cash for work support and farming inputs in an environment of recent history of relative lawlessness and vulnerability for conflict; d) security of project workers especially for workers delivering cash for work interventions; e) Sexual exploitation and abuse, sexual harassment (SEA/H) and other forms of GBV extending from registration for CTs or release of funds; f) harmful inward migration from non-beneficiary locations that can upset delicate community dynamics; g) labor influx from project workers engaged in civil works leading to exacerbation of E&S fragility; h) risks to community health and safety through clashes for resources, and water borne diseases; and i) displacement impacts including small scale involuntary economic and physical resettlement.

To mitigate these risks, a Stakeholder Engagement Plan (SEP) has been prepared to detail modalities for robust stakeholder engagements, inclusion for marginalized and minority members of the targeted communities and information disclosure procedures. Robust community engagements will be conducted before commencement of project activities as well as sensitization on the availability of a project GRM to support the systematic uptake, processing and resolution of project related complaints and grievances. For spraying activities, a rapid information dissemination campaign will be designed and disseminated in a medium with a wide reach, preferably local radios on the techniques of spraying, the chemicals used and its impacts on human health, crops and livestock. Vulnerable populations such as the elderly and those with disability will be supported in sheltering from the impacts of the spraying.

Key environmental risks and impacts under Component 2 are associated with the small to medium scale civil works entailing rehabilitation and reconstruction of public and community infrastructure. Civil works related 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.

For component 1, 2 and 3, an ESMF will be prepared by the PIU, consulted upon and disclosed prior to disbursement for activities under these components. UNOPs is supporting the preparation of the ESMF preparation process and a



draft has already been prepared. The ESMF will; (i) Provide the criteria and procedures for screening sub-project investments and guide the preparation of site-specific ESMPs or ESIAAs for higher risk projects (based on ESMF screening criteria) (ii) Provide subproject screening process to exclude sensitive areas (pristine or having ecological sensitive flora and fauna) from project activities (iii) Assess the institutional capacity of the government and the contracted implementing agencies and provide measures for capacity building and; iv) provide for TORs that will ensure that the planning process includes adequate assessment of E&S implications and is materially consistent with the ESF where development of policies or strategies may lead to potentially significant downstream E&S impacts . The ESMF will include provisions for estimated budget required for implementing the sub-project-level ESIAAs/ESMPs (iv) Cover Risks associated with other activities to be supported under component 1 and which include: (a) revitalizing basic health service provision to include strengthening of response services and referral pathways for survivors of GBV; and (b) support to in-country laboratory capacity, supporting government’s surveillance, monitoring, and emergency response capacity and supporting household hygiene promotion will be mitigated through Health Care Waste Management Plan included as part of ESMF. A separate CERC ESMF will be prepared for component 5. For activities whose approach will be defined during implementation further E&S risk will be reviewed for appropriate level of assessment at ESMF screening.

The project will support rehabilitation of some critical services and infrastructure (schemes) in FMS traversed by the Juba and Shebelle rivers considered international waterways as defined in paragraph 1 of the OP 7.50 Policy. The banks team have determined that these activities will not affect flow of water or quality of water to the other riparian, Ethiopia which is upstream from Somalia and the Project area. An exception to the notification requirement under OP 7.50 has been approved. The Bank will review TORs for the study of critical water management infrastructure for flood risk reduction for Beledweyne, under Component 3.

Site specific ESIAAs or ESMPs will be prepared during the implementation phase to inform the project design and include the assessment of the project when the nature, scope and geographical location of the sub-projects are known. Relevant management plans such as the OHS Plan and Labor Management Plan, Waste Management Plan (WMP), RAP, Security Management Plan and GBV/SEA Action Plan will be included in the site specific ESMPs, reviewed and approved by the World Bank prior to the start of any civil works. RAP will be fully implemented prior to commencement of civil works for each site requiring land acquisition or compensation to PAPs. The government will be responsible for RAP implementation.

Given that most of the anticipated E&S risks and impacts will occur during the construction phase, the contractor will be contractually bound to adopt and implement the ESMP consistent with (i) ESS1 (ii) ESS2 (iii) ESS3 (iv) ESS4 (v) ESS 10.

Relevant provisions of subproject-specific instruments will be incorporated into procurement documents and measures implemented during implementation of the project. Key E&S commitments of the borrower have been included in the ESCP.

Robust stakeholder engagements have been conducted with government agencies, civil society and NGOs that will be supporting project implementation and detailed in the SEP. Community consultations will be conducted prior to disbursement for activities under component 1 2 & 3 and sustained throughout the life of the project. Continuous and consistent implementation of the SEP, project and workers GRM, LMP, CERC ESMF and GBV action plan is expected to manage E&S risks associated with activities under compon

ESS10 Stakeholder Engagement and Information Disclosure



A key risks and impact under this standard relate to inadequate, ineffective and inappropriate stakeholder and community engagements and disclosure of information leading to exclusion of truly vulnerable, marginalized and minority members of the community from project benefits, amplified by the context of limited resources against widespread need. Others include elite capture where project benefits are diverted to less-deserving individuals and locations and poor access to beneficiaries for meaningful community engagements and difficulty in monitoring for social harm.

The MoHADM has prepared a Stakeholder Engagement Plan (SEP) which provides the framework for identification of stakeholders, gauging stakeholder interest and providing systematic means and processes of inclusive and meaningful engagements with the stakeholders and communities in away that influences project design and implementation under all components.

Robust community engagements will be conducted before commencement of project activities as well as sensitization on the availability of a project GRM to support the systematic uptake, processing and resolution of project related complaints and grievances. As some urgent activities related to locust control such as spraying and surveillance might be conducted under retroactive financing, a social audit will be conducted (where a rapid social assessment cannot be done prior) upon project effectiveness and a corrective action plan be implemented where gaps in effective application of social risks mitigation measures are found. Specifically, for spraying activities, a rapid information dissemination campaign will be designed and disseminated in a medium with a wide reach, preferably local radios on the techniques of spraying, the chemicals used and its impacts on human health, crops and livestock. Vulnerable populations such as the elderly and those with disability will be supported in sheltering from the impacts of the spraying.

A project wide Grievance Redress Mechanism (GRM) is being set up tailored to the different project interventions, geographical scope of each intervention and in accordance with the existing procedures. The GRM is designed to address concerns and complaints promptly and transparently with no cost or discrimination towards project affected communities. UNOPS, FAO and other humanitarian partners supporting project implementation will be the first point of contact for grievance redress with appeals being referred to a GRM officer stationed at the PIU. Reports will be periodically shared by each agency on complaints and grievance logs with the PIU for monitoring purposes. The PIU will maintain a documented record of stakeholder engagement and GRM, including a description of the stakeholders consulted, a summary of the feedback/grievances received and a brief explanation of how the feedback was considered, or the reasons why the issue could not be resolved.

For GBV, reporting and response protocol including identification of SEA/H and GBV-sensitive channels to be integrated into the grievance mechanism, and requirements for enabling survivor-centered care.

During preparation of the PMP and ESMF a series of consultations with different stakeholders will be held. These include drought-affected people , farmers in selected irrigation schemes, local government officials, extension workers, local leaders, non—governmental organizations and central government officials. Once subprojects are identified the preparation of site-specific ESMPs/ESIAs will include its own set of public consultations. The SEP and PMP will include budget for communication plan. Security risk posed by high-levels of ongoing violence may prevent



the implementation of activities in certain areas of Jubaland, Southwest and Hirshabelle States. Such issues will be detailed fully in the Security Management Plan and monitored closely by the PIU and Bank team.

Considering Covid-19 restrictions for communities affected by floods, locust, the project will innovate ways to consultations fit for purpose, effective and meaningful in order to meet project and stakeholder needs and adhere to the restrictions put in place by the government to contain virus spread. Strategies to be employed 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 will be implemented. Other strategies will include one on one interviews through phones and skype for community representatives, CSOs and other interests groups

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Key risks relate to security of workers, protection against child and forced labor, occupational health and safety and ensuring that labor for the project will be sourced and managed responsibly including the set-up of a labor specific GRM. Some of the project workers may be engaged in the component 3 that addresses COVID-19 issues. This category of workers will be separately identified, together with a clear description of what activities they will carry out.

Project workers will mainly entail existing Government civil servants that include health workers, UNOPs and FAO employees. Government civil servants will remain subject to the terms and conditions of their existing sector employment including relevant ESS 2 requirement applicable to civil servants. UNOPs and FAO employees and other project workers hired by the project including contractor workers they will be subject to the full requirements of ESS2. Relevant ESS 2 requirement will be applied to Community and volunteer workers.

A Labor Management Procedures (LMP) will be prepared before the commencement of project activities. The GBV risk is currently moderate and will be addressed in an action plan on SEA, GBV and psycho social support developed in line with the Labor Management Procedures (LMP). The LMP sets out the Project's approach and requirements to meeting national requirements as well as the objectives of ESS2 and ESS4 on Community Health and Safety. It will include procedures on incident investigation and reporting, recording and reporting of nonconformance, emergency preparedness and response procedures and continuous training and awareness to workers. The LMP will include procedures which (i) respond to the specific health and safety issues posed by COVID-19, and (ii) protect workers' rights as set out in ESS2.

The LMP will be developed by the PIU and as specified in the ESCP and will include a Code of Conduct for project workers. It will apply to all Project workers whether full-time, part-time, temporary or seasonal.

The LMP will also look at safety concerns and OHS in terms of working environment for workers, and will include provisions on OHS to inform individual subproject ESMPs. As part of the ESMF, occupational, health and safety (OHS) measures will be developed and implemented based on World Bank EHS Guidelines



Field officers who are directly involved in spraying operations tend to be the most exposed to insecticides, and thus also run the highest 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 (e.g. an applicator who carries out the loading of the pesticide, and also does the efficacy verification after treatment). Necessary personal protective equipment will be provided to all field officers directly involved in spraying.

PMP will include Safety measures, environmental precautions and monitoring as a standard contingency plans for the locust control campaign. Experts on pesticide safety and environment, as well as senior medical staff, will be involved in locust campaign planning and organization from the start. The PMP will also include FAO Desert Locust Guidelines on safety and environmental precautions.

ESS3 Resource Efficiency and Pollution Prevention and Management

Component 1 activities have risks related to ESS3 on people, ecosystem services and the environment. Pesticides use 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. The PMP will include recommendations and suggestions to reduce the environmental and health risks of locust control. Safety measures, environmental precautions and monitoring will be a standard part of the contingency plans for the locust control campaigns. Biopesticides will be used for the initial phase. Selection of phase 2 pesticide will be based on FAO's environmental criteria through an evaluation done by FAO pesticide referee group . The PMP includes measures on disposal of empty containers where it will be returned to the locust control base and not to be burned or buried on site, since this is dangerous to both humans and the environment. After the control campaign, the empty containers collected at the locust control base(s) will be dealt with in an appropriate manner, as described in the PMP. Where appropriate, the purchasing contract will stipulate that the pesticide manufacturer will take back the drums for reconditioning. The PMP also includes spill management measures and monitoring.

Risks related to ESS3 for component 2 and 3 include the normal impacts of civil works (i.e. generation of solid waste, dust and noise generation, soil erosion, pollution from construction wastes and water use). Resource efficiency measures will be analyzed and incorporated as part of the ESMF and the CESMP. Should the project utilize raw materials for construction activities, the material will be sourced through measures specified in Good International Industry Practices (GIIPs).

Risks related to component 3 activities relate to the handling and disposal of hazard/medical wastes and limiting the spread of communicable diseases e.g. Covid 19 through health provision. As part of the ESMF a health care waste management plan will be developed.

ESS4 Community Health and Safety

For component 1 activities, community health and safety risks may be through local populations exposure to pesticide through potential involvement in Desert Locust control (help localize spray targets) or through consumption of contaminated food grown in sprayed areas. Settlement nearby spray area may also be affected by activities around pesticide storage, accidental spillage, contaminated equipment, overspraying, entry into sprayed area and exposure



to empty pesticide containers. Often these impacts have a direct impact on the lives of local people in locust-affected areas. Environmental risk reduction therefore has to be done on a case-by-case basis by choosing the right insecticide for a given situation or environment, using the appropriate control strategy and method, and strictly applying environmental protection measures where possible.

Most rural people depend on wells or surface water to provide drinking-water; if these are polluted by insecticides, no alternative water supply may be available to them. Livestock will graze on green pastures just like locusts but no insecticide residues should end up in meat and milk after locust control operations. The PMP includes a communication plan to keep the public informed about possible environmental and health effects of insecticides, before, during and after locust control operations. This is to ensure that precautionary measures are taken whenever needed but also to reduce any misunderstandings that may exist about the risks of locust control. A specialized communication and information officer will be assigned to this task.

Inhabitants of the zone in which the treatments take place will be informed of the operation beforehand, and warned not to come close to it. Since Desert Locust spray targets are often identified during late afternoon, to be treated the following morning, inhabitants will be warned the evening before spraying. Control teams will ensure that nobody is present in the area to be sprayed. 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.

Ensuring security for project operations (including the protection of project workers, beneficiaries and affected persons) remains a complex challenge in a region largely characterized by a dire humanitarian situation due to multiple and simultaneous crises afflicting the country compounded by weak and developing government systems. This risk is further exacerbated by the provision of cash for work support for affected households,, all project benefits that raise the profile for targets by opportunistic armed actors in a context of recent history of relative lawlessness and the potential for increased conflict. The involvement of UNOPS, FAO and other humanitarian and development organizations with valuable knowledge and experience in delivering specialized operations in the target locations provide relative advantage to challenges of access to site and the identification and mitigation of security threats to project operations. In addition, these organizations partner with local NGOs that have a good understanding of local dynamics an important factor in managing exposure to security threats.

Another key risk relate to harmful inward migration as the project will mainly operate in a small number of sites relative to immense and widespread need, there remains a possibility of population influx from neighboring district and locations. When it occurs, this is likely to upset community dynamics and perpetuate clashes and animosity exacerbating social and environmental fragility. A primary mitigation measure is the selection of priority areas guided by findings and recommendations from FINA. In addition, proper and transparent targeting of vulnerable populations, ensuring inclusion in particular for displaced populations, for cash for work-based interventions and the small amounts of transfers is seen as a mitigating measure against harmful inward migration. Impacts of labor influx driven by the small-medium scale infrastructure works will be managed by the Labor Management Procedures that will include code of conduct for project workers

In addition, there are risks related to sexual exploitation and abuse, sexual harassment (SEA/H) and other forms for gender-based violence (GBV). Potential risks of gender-based violence, for example, may increase with the receipt of



cash for work transfers by women and children (within households or at payment points), as well as risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors, extending from registration or release of funds. The GBV risk rating for the project is therefore assessed to be high, necessitating integration of robust mitigation measures to manage these risks. Mitigation measures include develop and implement measures and actions to regularly assess and manage the risks of SEA/H and other forms of GBV extending from project activities, including key infrastructure elements as well as as the receipt of cash-for-work schemes by women and other vulnerable groups (within households or at payment points) and sexual exploitation and abuse risks such as sexual favors for registration or release of funds. The PIU will engage a dedicated specialist to support oversight and management of these risks. Safety audits will be developed for all relevant activities to ensure protection and security of affected communities and alignment with global protection standards. A GBV Action Plan will be drafted and included in the ESMF to include measures for minimizing SEA/H and GBV.

Community health and safety risks associated with the project activities for component 2 and 3 include exposure to physical hazards on project sites, traffic and road safety hazards, health issues including water-borne and vector borne diseases which may result from poor site management such as stagnant water, and communicable diseases. The ESMF will assess all these risks/impacts and mitigate them as part of ESMP and also be included in the civil works contracts. The ESMF/ESMP will also include information on emergency preparedness plan preparation and emergency alert systems in the case of floods or natural disasters or locust infestation. Dam Safety issues will also be included as part of the study of critical water management infrastructure.

Specific ESS 4 related risks under component 3 activities include Communities exposure to health problems arising from ineffective infection control and inappropriate healthcare waste management. In addition, construction, rehabilitation and/or refurbishment of health facilities is likely to pose danger to construction crews. The ESMF will provide measures around due care to be taken to minimise exposure of the beneficiary communities arising from poor infection control. The projects supports emergency preparedness and response mechanisms and this will address incidents associated with infection control as well as environmental and health incidents arising from medical waste management facilities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The reconstruction and rehabilitation of affected basic social and physical infrastructure (including rehabilitation/construction of laboratories) may in some cases entail the reconstruction of infrastructure in new locations to reduce risk and respond to the needs of displaced and host communities affected by the crisis. In addition, 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. In these cases, any activity or subproject leads to a loss of assets, sources of income, or means of livelihoods, a Resettlement Planning Framework (PPF) will be prepared for component 1, 2 and 3 will be prepared by the PIU, consulted upon and disclosed prior to disbursement for activities under these components and when sites are identified Resettlement Action Plans (RAP) or Abbreviated Resettlement Action Plan (ARAP) will be prepared as appropriate and in compliance with ESS 5 before work begins on each site .



With weaker or inexistent formal land administration authorities, processes for land expropriation and 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 and will need to be well managed to prevent negative impact

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Somalia has areas with inherent environmental sensitivity relevant to ESS6, the The locust crisis intervention support through spraying may affect important water source areas, natural resources or ecological functions on which local populations depend. For example, 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. The PMP includes efficacy assessment of pesticides to evaluate potential environmental impact of the insecticides and FAO has a pesticide referee group for this task who will inform preparation of the PMP. The project will also 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 to create buffer zones to protect sensitive areas such as watering points (springs, wells, pans, ponds, dams) and open water to homesteads, grazing areas to protect sensitive environment, human and animal health.

For activities under component 1, 2 and 3 subproject screening process in the ESMF/ESMP will exclude sensitive (pristine or having ecological sensitive flora and fauna) areas for project activities proposed under component 1, 2 and 3. The ESMF/ESMP will also include specific measures to avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas. The impact (whether singular or cumulative) of small-scale civil works associated with civil works on sensitive areas will be minor. 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.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

There are no groups in Somalia that are currently considered as IP/SSAHUTLC

ESS8 Cultural Heritage

There is the potential for chance find of cultural or archeological significance during construction that could potentially be impacted from the construction. The ESMF will cover risks associated with intangible cultural heritage (such as disruption to religious/cultural festivity in the community by civil work). Subproject specific ESMPs will address these issues through the inclusion of chance find procedures and site-specific mitigation measures



ESS9 Financial Intermediaries

Activities relating the use of Financial Intermediaries currently not being considered under this project

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

Yes

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 approved the exception memo on April 1, 2020.

OP 7.60 Projects in Disputed Areas

No

III. BORROWER'S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
1. Environmental and Social Management Framework (ESMF) 2. Environmental and Social Management Plans (ESMPs)	06/2020
ESS 10 Stakeholder Engagement and Information Disclosure	
1. Stakeholder Engagement Plan 2. Project wide GRM	05/2020
ESS 2 Labor and Working Conditions	
1. Labor Management Procedures (LMP) 2. Code of Conduct for project workers 3. Labor Specific GRM 4. Occupational Health and Safety Plan (OHP)	06/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	

Public Disclosure



1. Pest Management Plan 2. Waste Management Plan (WMP)	05/2020
ESS 4 Community Health and Safety	
1. GBV Action Plan 2. Security Management Plan	07/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
1. Resettlement Policy Framework 2. Resettlement Action Plan	08/2020
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
PMP and ESMF to include provisions to avoid or reduce impacts for biodiversity from use of pesticides	05/2020
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
ESS 8 Cultural Heritage	
Environmental and Social Management Framework (ESMF)	06/2020
ESS 9 Financial Intermediaries	

Public Disclosure

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

Use of borrower framework not currently being considered

IV. CONTACT POINTS

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Borrower: Ministry of Finance, Federal Government of Somalia

Implementing Agency(ies)



Implementing Agency: Ministry of Finance, Federal Government of Somalia

Implementing Agency: Ministry of Planning, Investment and Economic Development, Federal Government of Somalia

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Ayaz Parvez
Practice Manager (ENR/Social)	Robin Mearns Cleared on 10-Apr-2020 at 12:34:40 EDT
Safeguards Advisor ESSA	Nathalie S. Munzberg (SAESSA) Concurred on 10-Apr-2020 at 17:56:38 EDT