BENADIR REGIONAL ADMINISTRATION

MOGADISHU MUNICIPALITY

SOMALI URBAN RESILIENCE PROJECT

Environmental & Social Management Framework

(ESMF)

BENADIR REGIONAL ADMINISTRATION

JUNE 2018

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ABBREVIATIONS, ACRONYMS, UNITS

AfDB	African Development Bank
AMISOM	African Union Mission in Somalia
ARAP	Abbreviated Resettlement Action Plan
BRA	Benadir Regional Administration
BOD	Biological Oxygen Demand
COD	Chemical Oxygen Demand
EEZ	Exclusive Economic Zone
EHS	Environmental, Health, and Safety Guidelines
EHSMP	Environmental, Health, and Safety Management Plan
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FAO	Food and Agriculture Organisation
FGS	Federal Government of Somalia
FS	Feasibility Studies
GAP	Gender Action Plan
GBV	Gender-Based Violence
GCL	Geosynthetic Clay Liner
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HDI	Human Development Index
HDPE	High Density Polyethylene
IDP	Internally Displaced Person
IUU	Illegal, Unreported and Unregulated
IGAD	Inter-Governmental Authority for Development
ILRP	Income and Livelihood Restoration Program
IT	Information Technology
M&E	Monitoring and Evaluation
MDA	Ministry, Department and Agency

MoPWR&H	Ministry of Public Works, Reconstruction and Housing
MoM	Municipality of Mogadishu
MPA	Marine Protected Area
MSW	Municipal Solid Waste
NERAD	National Environment Research and Disaster Preparedness Authority
NGO	Non-Governmental Organisation
PCIP	Precast Construction Interlock Pavement
PEDs	Preliminary Engineering Designs
PFM	Public Financial Management
PIM	Project Implementation Manual
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PPP	Private-Public Partnership
RAP	Resettlement Action Plan
RCC	Reinforced Cement Concrete
RoW	Right of Way
RPF	Resettlement Policy Framework
SE	Supervisory Engineer
SFF-LD	Special Financing Facility for Local Development
SUIPP	Somalia Urban Investment Planning Project
SURP	Somali Urban Resilience Project
SWALIM	Somalia Water and Land Information Management
TFG	Transitional Federal Government
UNDP	United Nations Development Program
UNOCHA	United Nations Office for the Coordination of Humanitarian Affairs
UNOPS	United Office for Project Services
UNPF	United Nations Population Fund
UNSOA	United Nations Support Office for AMISOM
WHO	World Health Organisation
° C	degrees Centigrade
ha	Hectare

km	Kilometre
LPCD	litres per capita per day
m	Metre
m^3	cubic metre
MLD	million litres per day
Mm	millimetre

0 EXECUTIVE SUMMARY

The proposed Somalia Urban Recovery Project (SURP) has three components: (1) Mogadishu Municipality; (2) Garowe Municipality; and (3) Contingent emergency response. This ESMF applies to Components 1 and 3.

Component 1: Mogadishu Municipality (US$6.50 million)

This component will finance the rehabilitation of approximately 19 roads in 7 districts of Mogadishu, covering an estimated total of 7.5 km. Under the Somali Urban Investment and Planning Project (SUIPP), the preparatory phase of SURP, a Project Implementation Unit (PIU) was established within the BRA and capacity of PIU staff strengthened, institutional assessment of the municipality undertaken, and Feasibility Studies, Preliminary Engineering Designs for 31 roads across all 17 districts of Mogadishu with a total cost of US$6.9 million were prepared. These roads were selected based on participatory consultations held in each of the 17 districts that involved the BRA, district councils, traditional leaders, and community representatives. However, due to funding constraints, only US$4.37 million including supervision fees is available for road rehabilitation which will finance approximately 19 roads with a total length of 7.5 km. This particular package of roads is being selected based on the following criteria: (i) strategic importance of the target areas in central Mogadishu; (ii) connectivity to key socio-economic facilities such as markets, health facilities, schools, mosques, and district headquarters; and (iii) benefit to both urban poor communities as well as IDP communities. The specific roads to be financed in the project may be subject to change due to budgetary, security and political economy considerations.

The Feasibility Studies and Preliminary Engineering Designs for these roads were carried out during the preparation project – the SUIPP. The roads will be accompanied with side drainage to mitigate against flash floods that can impact the road investments, pedestrian walkways to ensure a larger percentage of the population benefit from the project, and solar battery charged street lights to improve safety of communities. As this component cannot finance all key primary and secondary roads in Mogadishu, analytical work looking into road connectivity and drainage networks within the city is being carried out which will help the government identify and prioritize areas for future investments in these sectors. (See para 26)

All roads in this component will be constructed using precast concrete interlocking paving blocks with properly compacted sub-base and base materials. Such roads have two key advantages: (i) it is labor intensive and will provide short term income generation opportunities for communities; and (ii) it would allow communities to maintain and repair the roads with minimal training and support. The project will ensure that both IDPs and host communities, particularly the poor and the marginalized, equally benefit from the short-term employment opportunities. It is estimated that approximately 22,000 person days of labor would be generated from employment of approximately 330 people in the rehabilitation/construction of the targeted 19 roads. Moreover, the project will support the formation of Maintenance Committees within each district to supervise and mobilize the community for necessary maintenance and repairs. All roads have inverted block concrete open side drainage catered for in the detailed engineering designs.

This component will also support the capacity building of the PIU in Mogadishu with a focus on financial management, procurement and environmental and social safeguards and engineering. While basic, these are the areas that are critical for ensuring the implementation

of quality infrastructure in a transparent and accountable manner, which in turn will help strengthen people's trust in the municipal government's ability to deliver services. The PIUs are de facto part and parcel of the municipalities and on-the-job capacity development of the PIU staff will translate into knowledge transfer to the wider municipal staff. The capacity strengthening builds off of the institutional assessments carried out for BRA under the SUIPP.

To supplement the capacity building activities financed under SURP, concurrent Technical Assistance (TA) is being provided to the BRA through funding from the Global Facility for Disaster Reduction and Recovery (GFDRR). This TA supports the preparation of a Trunk Drainage Masterplan as well as a Road Connectivity Assessment for Mogadishu. The Trunk Drainage Masterplan will map out existing trunk drainage systems and identify gaps in their connectivity and develop topography specific designs. This will help mitigate unplanned expansion of the drainage system, frequent localized flooding, and road shoulder erosion among others. A comprehensive drainage network will also help ensure that roads built under SURP are well maintained. The proposed Road Connectivity Assessment will look at how the main road network can be developed to improve the connectivity of SURP-financed roads to existing and proposed trade and commercial hubs and socio-economic facilities. The proposed activities, together with the SURP, will help strengthen municipal governance of BRA and urban resilience of Mogadishu through better planning and (re)construction of critical urban roads and drainage systems in the city. Such master plans would also enable the BRA to develop Mogadishu city in a more planned and coordinated manner going forward and provides the municipality an important tool to maximize limited resources and mobilize additional financing for roads and drainage works.

This component will finance the development of O&M plans for the road and drainage investments supported under the project including support to the Maintenance Committees at the district level. These committees have already been formed by the BRA and TIS+ program for the maintenance of secondary roads in the city and are composed of the District Administrator, community members, religious leaders and members of the business association. Under the SURP, the composition of these committees will be revisited to ensure greater inclusivity of women, youth and IDPs. Further, the committees will be provided training to better take on their role of informing the municipal governments of maintenance needs of the secondary roads and mobilizing and engaging community members for day-to-day maintenance such as gutter clearance as required. This component will also finance the training of BRA units responsible for infrastructure maintenance, help the municipality develop and improve guidelines for the formation process and composition of the Maintenance Committees, and support better coordination of the committees' activities. Actual maintenance of the roads is expected to be financed by BRA and is not allocated for this in project due to the limited funding available.

Finally, this component will finance project management costs i.e.- staffing of the PIU in Mogadishu; audits; establishment and implementation of a grievance redress and feedback mechanism (GRM) related to project activities; and monitoring and evaluation of project activities including geo-enabled monitoring. Recognizing that various elements of the project could become a focus for local disputes, the GRM will be integrated into the design of the project and described fully in the Project Implementation Manual (PIM).

Component 3: Contingent Emergency Response (US$0 million)

This contingency emergency response component (CERC) is included under the project in

accordance with Bank Policy Investment Project Financing dated November 10, 2017, Paragraph 12 and 13 for situations of urgent need of assistance, as a project-specific CERC. This will allow for rapid reallocation of project funds in the event of a natural or man-made crisis in the future, during the implementation of the project, to address eligible emergency needs under the conditions established in its operations manual. This component will have no funding allocation initially and will draw resources from the other expenditure category in the case of activation. If an Immediate Response Mechanism (IRM) is established, this component will serve as an IRM CERC to allow the reallocation of uncommitted funds from the project portfolio to the IRM Designated Account (DA) to address emergency response and recovery costs, if approved by the World Bank.

The proposed Project entails the construction of existing community roads using precast concrete interlock pavement (PCIP).

The likely project activities to be implemented will include:

- Removal of bushes, big stones, grass and other obstacles with actual width of the road reserve;
- Excavation for open drains, backfilling to subsoil drainage systems;
- Removal of unsuitable materials, preparation of roadbed and subgrade;
- Construction of sub-base layer from gravel or crushed stone;
- Installation of concrete interlocking block including sand bedding for levelling; and
- Curb stone installation

It is likely that land will be acquired temporarily for storage of construction materials, project vehicles and equipment. The activities may involve temporary involuntary resettlement. No permanent resettlement will be needed, only some small roadside structures (kiosks or tables) may be temporarily displaced during construction but able to return after works are completed. A Resettlement Policy Framework has been prepared. The RPF will provide guidance for RAPs to be prepared once specific road segments are selected.

In line with the requirements of the World Bank Safeguards for Environment Category B projects, the preparation of this ESMF included the conduct of public consultations involving Project stakeholders such as relevant government agencies, beneficiary communities, mass organizations residing/operating/having jurisdiction within the Project area; and World Bank and UNOPS representatives. The consultation process began on 17 May 2016 and continued until January 2017.

To effectively implement the environmental and social management measures suggested as part of the ESMF, necessary budget need to be provided. An indicative budget had been provided in Table 12 that will cover safeguards related expenses such as capacity-building programs, coordination and public consultation meetings; planning workshops, monitoring work, environmental consultancy services. This estimated budget does not include the cost for mitigation and enhancement measures, which will be integrated into the construction cost. Likewise, all administrative costs for the operation of the PIU Safeguard Unit are including in the overall Project cost.

1 INTRODUCTION

1.1 Background

Somalia is emerging from a legacy of two and half decades of cycles of violent conflict, fragility and lack of formal and internationally recognized governance structures. Sustained violence and lack of cohesive governance has contributed to widespread internal migration, poor living conditions, and extreme vulnerability to famine, disease, and high mortality rates.[1]

The majority of Somalis today live in poverty and vulnerability. 2.3 million live on the margins of food insecurity and 1.1 million are internally displaced. Poverty is estimated at 73 percent and extreme poverty at 43 percent with poverty heavily concentrated in settlements of Internally Displaced Persons (IDPs). GDP is estimated at US$ 288 per capita. Humanitarian aid has been fundamental to many during decades of crisis, but on its own, it cannot provide the sustainable livelihoods necessary for poverty reduction. For that, Somalia needs stability and investment in legitimate institutions that can enable basic service delivery, infrastructure financing, and inclusive growth[2].

Poverty in Somalia manifests largely as pressing humanitarian issues with a large proportion of the population affected by food insecurity. This reflects the legacy of violent conflict but is increasingly overlaid with vulnerability to climate shocks whose impact is in turn exacerbated by lack of attention to building climate resilience. 6.7 million people across Somalia are estimated to be in need of humanitarian assistance, of which nearly 3.2 million are expected to face Crisis and Emergency (IPC Phase 3 and 4) levels of food insecurity through June 2017.[3]

The recent drought has further exacerbated existing factors of vulnerability poverty in the country, including conditions of protracted displacement. Over 6 million Somalis have been severely affected by the drought which began in late 2016 and has been declared a national disaster by Somali authorities. Majority of the drought related displacement is taking place from rural to urban areas with populations moving to urban centers to join existing settlements for the internally displaced. Most of the drought-displaced people are hosted in settlements in Baidoa (177,000 people) and Mogadishu (161,000 people), representing 44 percent of drought-related displacements.[4]

The urban population is growing rapidly as a result of returnees and increasing numbers of IDPs settling in and around urban areas. While it is difficult to produce widely accepted population figures, the total population of the Somali peninsula is estimated to be over 12 million, growing at a rate of roughly 3 percent annually. The current urban population is estimated at around 5.2 million people (42 percent), with a growth rate of around 4 percent per

[1] UNSOM (2017): Somalia Conflict and Situation Analysis (February 2017).
[2] World Bank. 2013. *Somalia - Interim strategy note for the period (FY14-FY16)*. Washington, DC; World Bank Group.
https://hubs.worldbank.org/docs/imagebank/pages/docprofile.aspx?nodeid=18662723
[3] UNOCHA (2017): Somalia: Drought response Situation Report No. 8 (as of 16 May 2017).
[4] Humanitarian Bulletin, July 2017, UNOCHA

annum.[5] The urbanization patterns and with it, social relations, have been further complicated by growing numbers of IDPs[6] and returnees settling among host communities that are already struggling with limited access to basic services and infrastructure.

Increasing control over territory in recent years have offered hope for peace and normalization. Despite the country's fragility, it has remained on a positive trajectory following the August 2012 peaceful transfer of power from a transitional to a full federal government in Mogadishu which generated domestic political momentum and triggered international recognition and support for the federal government. Over the last four years, Somalia has made encouraging steps towards a political settlement and the rehabilitation of government institutions. The creation of four new regions – Jubbaland, South-West, Galmudug and Hirshabelle – and the ouster of Al Shabab from the major urban centers of Mogadishu and Kismayo form the basis for a devolved/federal political settlement. While Al Shabab retains control and continues to destabilize parts of southern Somalia, it no longer administers or controls major urban areas.

A new Government peacefully transferred to power in 2017. The election of a new Federal Government of Somalia (FGS) President in early February 2017 successfully concluded the federal electoral process and transitioned power peacefully to the new FGS President Mohamed Abdullahi Mohamed Farmaajo. In his inaugural address, the President outlined some of his priorities including security, good governance and anti-corruption, and tackling drought and poverty. Political reconciliation and democratization processes are now underway and the new constitution is being finalized.

1.2 Sectoral and Institutional Context

Fast-growing urban areas are integral to recovery and growth, but present challenges to stability due to population dynamics. Urbanization in Somalia has been spurred by externally and internally induced cyclical waves since the end of the 1960s, and urban markets and service centers are becoming increasingly important as centers for resilience and incubators for growth. Somalia frequently experiences external and internal shocks that drive people to urban centers looking for shelter, food, and safety. Insecurity, droughts and famines, flooding and returning refugees have added significant numbers of initially internally displaced that have (semi-permanently) settled in urban centers across Somalia, mainly Mogadishu, Baidoa and Kismayo. Recent droughts, the pending closure of Dadaab refugee camp and the continued control of rural areas by Al-Shabab have led to increased urban migration. If the current trend persists, by 2030, Somalia will add another 4.5 million urban residents to its already constrained urban environment, nearly doubling current numbers.

While rebel and factional violence can cause residents to seek refuge in urban areas, violence and insecurity affect key urban areas as well. Although the security situation has improved, with the Federal government pushing rebel groups out of the major cities, violence and terrorism persist in urban areas. Continued insecurity hampers growth, destroys infrastructure, and limits economic and educational opportunities. It also hinders the private sector investment needed to allow cities to invest in infrastructure and provide improved livelihood opportunities to the poor.

[5] UNFPA (2014)
[6] Estimated to be 1.1 million located in urban and peri-urban areas

A pattern of urban growth has emerged in Somalia with three tiers of cities with different but interrelated characteristics. There has been no systematic analysis of the economies of Somali main cities and towns. Broadly, however, the pattern of economic development within the country appears to have been determined largely by locational dynamics related to regional and international trade and transit (with associated development of infrastructure, particularly ports and airports), the servicing of agricultural activities in adjacent hinterlands, the location of government administration, and more recently, the emergence of service sectors, such as Information Technology (IT). In this context, and that of the demographic dynamics mentioned above, a three-level urban hierarchy has emerged.

- ***Primary city.*** The urban hierarchy in Somalia is dominated by its main city, Mogadishu, the seat of the federal government and an important financial and trade hub, endowed with the most extensive urban infrastructure in the country, including an international airport, a large port, and national roads. The city has about 1.4 million residents.
- ***Secondary cities.*** There are six secondary cities in Somalia, ranging in size between 200,000 and 700,000 residents, in most cases functioning as smaller transit hubs. Secondary cities include Hargeisa, the second largest city in Somalia (with an estimated population of 700,000), capital of the relatively more stable Somaliland, and a growing financial hub hosting financial institutions and firms. Kismayo and Bosaso are other secondary cities hosting important ports and have emerged as new economic poles for the regions in which they are located. Baidoa, a regional state capital and home to vibrant markets and large IDP populations, emerges as an important hub for trade and place for refuge for people displaced due to multiple causes. Although it has a significantly smaller population than the others, Garowe (population 70,000), the state capital of Puntland, may be classified as a secondary city given its regional importance.
- ***Tertiary cities.*** Beyond primary and secondary cities, Somalia features a wide range of much smaller tertiary cities, with populations below 100,000 residents. Most of these cities are economically dependent on larger urban areas close to them, or serve as centers of food and livestock supply.

The table below provides summary data on Somalia's urban hierarchy.

	Area	City	Population (estimates)	Key infrastructure
Primary	Benadir	Mogadishu	1.4 million	Port, airport, federal government capital
Secondary	Somaliland	Hargeisa	700,000	Airport, Somaliland capital
		Berbera	200,000	Port, airport
	Puntland	Bosaso	400,000	Port, airport
		Garowe	70,000	Airport, Puntland capital
	Galmudug	Galkayo	550,000	Airport
		Dhusamareb	80,000	Galmudug capital
	Jubaland	Kismayo	500,000	Airport, port, Jubaland capital
	South West	Merca	230,000	Port
		Baidoa	150,000	Airport, South West capital

Tertiary	Somaliland	Burao	80,000	Airport
	Hirshabelle	Beledweyne	70,000	Airport
		Jowhar	65,000	Hirshabelle Capital

Coverage of basic infrastructure and services in Somalia is generally inadequate. It is characterized by poor access to clean water, proper sanitation and solid waste management leads to negative impacts on health and welfare of the citizens as well as the economy. Decades of conflict and fragility has prevented any significant investment in infrastructure. Below is an overview of the status of urban infrastructure in Somalia.

Roads, side drainage and street lighting. Aggregate data specifically relating to urban road networks and coverage is not readily available. However, it is estimated that there are 22,100 km of roads in the country of which 2,600 km are paved (11.7 percent). Satellite imagery of Mogadishu, Hargeisa, and Garowe indicates that the urban roads networks are reasonably well laid out. From a review of this imagery and interviews and discussions with city officials and technical specialists, it appears that other than the limited paved trunk roads, most of the secondary and tertiary roads in the urban areas are engineered earth roads with associated side drains. Currently, street lighting is not a standard appliance added to urban roads due to both capital cost requirements and the high recurrent costs of power.

Water supply, sanitation[7]. Progress has been made over the past two decades leading to a reported 66 percent level of coverage of "improved" water supply services for the urban population and a 52 percent level of coverage of improved sanitation services for the urban population.[8] According to available data, 53 percent of urban households have water piped into their houses. Therefore, 13 percent of those households with an "improved" supply of water do not have a house connection, most like through a kiosk or standpipe service.[9] As there are no public agencies providing water supply in urban areas, multiple, unregulated private operators provide systems of varying scope and quality. In addition, with the increased coverage of water supply within a densifying population, issues have surfaced as to the environmental and health impacts of the additional wastewater generated; with no formal sanitation services provided, it is being discharged directly into the drainage network.

There appears to be little engineered storm water drainage infrastructure in urban areas aside from Mogadishu, where it was reported that there some drainage systems were constructed prior to 1991, little of which remains. In the absence of engineered storm water drainage infrastructure in urban areas, the natural streams and rivers act as the main drainage "sinks" with neighbourhoods draining into these. Where there are constrictions in neighbourhood drainage patterns, flood is prevalent during high rainfall events.

Solid waste management. A rough estimate of 1,500 tons per day of solid waste is generated

[7] A separate policy guidance note, "Water Supply and Sanitation in Somalia" has been issued which provides an overview of the key WSS sector data.
[8] These coverage figures have been derived from the UNICEF/WHO Joint Monitoring Programme.
[9] Improved water supply is essentially defined as an engineered supply. An improved supply is typically via a reticulated network, kiosk, standpipe, or protected well / borehole. A supply designated as "unimproved" would typically be community wells / boreholes that have contamination problems.

in the urban areas of Somalia. In aggregate, only a small percentage of this is collected and disposed of in dump sites, and none of it is handled in properly designed, constructed, and operated sanitary landfills.[10] In sum, solid waste is a major issue across urban areas, even where there are Public-Private Partnerships (PPP) arrangements in place. Cities are characterized by high levels of uncollected solid waste, with refuse strewn throughout neighbourhoods and public spaces.

Power supply. There is no national power supply grid. Almost all power generated in the country is supplied to the urban areas with fossil fuel generators producing a total of 315 million kWh/year of power for the major urban centres. The estimated installed capacity for the country is 60 MW. Most of the generation of power in the country is provided by small private operators working outside of any regulatory framework. Mogadishu has three such power suppliers servicing different parts of the city. The cost of power ranges between $1.28 / Kwh in Mogadishu and $1.00 / kWh in Garowe --- very costly by international standards (the price of power in Kenya is roughly $0.20 / kWh, Uganda, $0.28 / kWh, and in the USA it is roughly $0.15 / kWh).[11]

Markets. Improvements in the public markets of the urban areas would assist in improving the income generation of the residents of the cities. Not much is known about the markets within the overall urban context but given the lack of any government investments in public infrastructure over the past 20 years, it can be assumed that rehabilitation, expansion, and construction of new markets will have positive impacts and dividends. This is an area that needs further study.

Against this background of increased migration to urban centers and poor condition of services and infrastructure in urban areas, the Government and donor community have recognized the need for establishing sustainable service-delivery mechanisms in cities. An increased focus on resilience-based approaches to development is required that builds government's capacity for municipal planning oriented to better preparing urban areas to absorb shocks. Investments in infrastructure in urban areas can not only help support the self-reliance and integration of the displaced, but can also help improve the overall living standards of host communities and other vulnerable and minority groups. Critically, urban infrastructure activities will contribute to broader efforts to strengthen urban support services and service delivery while also having the potential to benefit particularly vulnerable communities, increasing in particular connectivity for returning refugee populations, as well as communities affected by both protracted displacement as well as those newly displaced as a consequence of the recent drought.

Given the unique country context, and the need to sequence available funding, the Government decided on this smaller preliminary project in Mogadishu and Garowe. While this project focuses on secondary roads and bridge investments exclusively, it would help lay the groundwork for a larger country wide urban investment program. Additional funding would allow future investments in wider urban service delivery needs such as water, sanitation, waste management to be delivered through local government institutions.

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[10] Assuming each person in the urban areas generates roughly 0.5 kg/day of solid waste, this is within reasonable internationally accepted limits. Assuming the urban population in Somalia to be approximately 4.2 million, the solid waste generated is approximately 2,100 tons per day.

[11] A separate Policy Note, *Developing Electricity Access in Somalia in a Post-Conflict Context* has been developed, analyzing the national energy sector in greater detail.

In 2016, the SUIPP was approved for US$ 6 million. It has financed technical and engineering design work for an estimated US$ 80 million urban investment program in three cities – Mogadishu, Hargeisa and Garowe; carried out institutional assessments of three municipalities as well as the Hargeisa Water Agency and the Ministry of Public Works; and helped to set up PIUs and build fiduciary, safeguards, project management, and monitoring and evaluation capacity of the PIU staff. In Mogadishu, the SUIPP has carried out feasibility studies and preliminary engineering designs for both 17km of primary urban roads and 19km of community roads across 17 districts totaling an investment of US$ 30 million. In Garowe, feasibility studies and preliminary engineering designs were carried out for 30 km of secondary roads and 2 bridges totaling investments of US$ 17 million.

Complementing support for urban investment is the Special Financing Facility for Local Development (SFF-LD) Project. The project is providing US$ 6 million in support for priority infrastructure (e.g. roads, markets, clinics, schools) in several of Somalia's pre-1991 Regions. The project is also providing capacity supporting for the FGS and the Regional Authorities. Finally, the SFF-LD also provides a window for government response to natural disasters and crises such as drought or flooding.

Both the SUIPP and SFF-LD, albeit starting from different levels of governance, make use of emerging Public Financial Management (PFM) and intergovernmental systems, using country systems to deliver capital investments on-treasury and on-budget. SFF-LD operates out of the federal Ministry of Finance and coordinates investments with stakeholders from all levels of government. Procurement and supervision functions are performed by the Ministry for small-scale investments across Somalia, mainly in smaller secondary and tertiary cities. This expands the use of the PFM system from existing recurrent cost mechanisms to capital investments in the emerging federal member states. The proposed SURR, on the other hand, aims to support funds flows from the federal to lower levels of government, with the implementing agency located at the municipal level, mostly in primary and larger secondary cities. The important reforms and mechanisms supported through the World Bank PFM and Recurrent Cost and Reform (RCRF) projects have been tested under SUIPP and will be utilized to deliver much needed capital investments on subnational levels of governance under the proposed SURR and ongoing SFF-LD.

2 PROJECT DESCRIPTION

SURRP will use the UIPP output preliminary designs, ESMF and economic indicators as a guide for the preparation of the final detailed designs and tendering of civil works and actual construction of approved roads subprojects in Mogadishu.

2.1 Project Components

Component 1: Mogadishu Municipality (US$6.50 million)

Infrastructure. This component will finance the rehabilitation of approximately 19 roads in 7 districts of Mogadishu, covering an estimated total of 7.5 km. Under the Somali Urban Investment and Planning Project (SUIPP), the preparatory phase of SURP, a Project Implementation Unit (PIU) was established within the BRA and capacity of PIU staff strengthened, institutional assessment of the municipality undertaken, and Feasibility Studies, Preliminary Engineering Designs for 31 roads across all 17 districts of Mogadishu with a total cost of US$6.9 million were prepared. These roads were selected based on participatory consultations held in each of the 17 districts that involved the BRA, district councils, traditional leaders, and community representatives.[12] However, due to funding constraints, only US$4.37 million including supervision fees is available for road rehabilitation which will finance approximately 19 roads with a total length of 7.5 km. This particular package of roads is being selected based on the following criteria: (i) strategic importance of the target areas in central Mogadishu; (ii) connectivity to key socio-economic facilities such as markets, health facilities, schools, mosques, and district headquarters; and (iii) benefit to both urban poor communities as well as IDP communities. The specific roads to be financed in the project may be subject to change due to budgetary, security and political economy considerations.

The Feasibility Studies and Preliminary Engineering Designs for these roads were carried out during the preparation project – the SUIPP.[13] The roads will be accompanied with side drainage to mitigate against flash floods that can impact the road investments, pedestrian walkways to ensure a larger percentage of the population benefit from the project, and solar battery charged street lights to improve safety of communities. As this component cannot finance all key primary and secondary roads in Mogadishu, analytical work looking into road connectivity and drainage networks within the city is being carried out which will help the government identify and prioritize areas for future investments in these sectors. (See para 26)

All roads in this component will be constructed using precast concrete interlocking paving blocks with properly compacted sub-base and base materials. Such roads have two key advantages: (i) it is labor intensive and will provide short term income generation opportunities for communities; and (ii) it would allow communities to maintain and repair the roads with

[12] The community representative groups used were those set up by the USAID funded Transition Initiatives for Stabilization project and included participation from women, youth and IDPs groups. The consultations where led by BRA with support from the UNOPS community liaison team.

[13] During the SUIPP, it was originally estimated that a unit cost of 1km of road would be USD200,000. The PEDs however have determined that this was grossly underestimated and the cost per 1km is at USD 380,000 (almost 90% higher than the original estimate).

minimal training and support. The project will ensure that both IDPs and host communities, particularly the poor and the marginalized, equally benefit from the short-term employment opportunities. It is estimated that approximately 22,000 person days of labor would be generated from employment of approximately 330 people in the rehabilitation/construction of the targeted 19 roads. Moreover, the project will support the formation of Maintenance Committees within each district to supervise and mobilize the community for necessary maintenance and repairs. All roads have inverted block concrete open side drainage catered for in the detailed engineering designs.

This component includes the engineering supervision of the civil works contracts by an independent engineering supervision firm or agency. The supervision fees for both Mogadishu and Garowe have been included in this component as BRA will be managing the engineering supervision consultancy contract for the civil works in both cities. In Mogadishu, the supervision firm would be required to procure equipment for the testing of the crushing strength of the precast concrete interlocking blocks. This equipment would most likely be set up at the Minister of Public Works with capacity building incorporated into the Terms of Reference for the supervision engineering firm. Given the allocation of funds for road rehabilitation is small, the costs of engineering supervision for these roads would be proportionately high as there would be minimal economies of scale.

Capacity Building. This component will also support the capacity building of the PIU in Mogadishu with a focus on financial management, procurement and environmental and social safeguards and engineering. While basic, these are the areas that are critical for ensuring the implementation of quality infrastructure in a transparent and accountable manner, which in turn will help strengthen people's trust in the municipal government's ability to deliver services. The PIUs are de facto part and parcel of the municipalities and on-the-job capacity development of the PIU staff will translate into knowledge transfer to the wider municipal staff. The capacity strengthening builds off of the institutional assessments carried out for BRA under the SUIPP.

To supplement the capacity building activities financed under SURP, concurrent Technical Assistance (TA) is being provided to the BRA through funding from the Global Facility for Disaster Reduction and Recovery (GFDRR). This TA supports the preparation of a Trunk Drainage Masterplan as well as a Road Connectivity Assessment for Mogadishu. The Trunk Drainage Masterplan will map out existing trunk drainage systems and identify gaps in their connectivity and develop topography specific designs. This will help mitigate unplanned expansion of the drainage system, frequent localized flooding, and road shoulder erosion among others. A comprehensive drainage network will also help ensure that roads built under SURP are well maintained. The proposed Road Connectivity Assessment will look at how the main road network can be developed to improve the connectivity of SURP-financed roads to existing and proposed trade and commercial hubs and socio-economic facilities. The proposed activities, together with the SURP, will help strengthen municipal governance of BRA and urban resilience of Mogadishu through better planning and (re)construction of critical urban roads and drainage systems in the city. Such master plans would also enable the BRA to develop Mogadishu city in a more planned and coordinated manner going forward and provides the municipality an important tool to maximize limited resources and mobilize additional financing for roads and drainage works.

Operation and Maintenance (O&M). This component will finance the development of O&M plans for the road and drainage investments supported under the project including support to

the Maintenance Committees at the district level. These committees have already been formed by the BRA and TIS+ program for the maintenance of secondary roads in the city and are composed of the District Administrator, community members, religious leaders and members of the business association. Under the SURP, the composition of these committees will be revisited to ensure greater inclusivity of women, youth and IDPs. Further, the committees will be provided training to better take on their role of informing the municipal governments of maintenance needs of the secondary roads and mobilizing and engaging community members for day-to-day maintenance such as gutter clearance as required. This component will also finance the training of BRA units responsible for infrastructure maintenance, help the municipality develop and improve guidelines for the formation process and composition of the Maintenance Committees, and support better coordination of the committees' activities. Actual maintenance of the roads is expected to be financed by BRA and is not allocated for this in project due to the limited funding available.

Project Management. Finally, this component will finance project management costs i.e.- staffing of the PIU in Mogadishu; audits; establishment and implementation of a grievance redress and feedback mechanism (GRM) related to project activities; and monitoring and evaluation of project activities including geo-enabled monitoring. Recognizing that various elements of the project could become a focus for local disputes, the GRM will be integrated into the design of the project and described fully in the Project Implementation Manual (PIM).

Component 2: Garowe Municipality (US$ 2.50 million)

Component 3: Contingent Emergency Response (US$0 million)

This contingency emergency response component (CERC) is included under the project in accordance with Bank Policy Investment Project Financing dated November 10, 2017, Paragraph 12 and 13 for situations of urgent need of assistance, as a project-specific CERC. This will allow for rapid reallocation of project funds in the event of a natural or man-made crisis in the future, during the implementation of the project, to address eligible emergency needs under the conditions established in its operations manual. This component will have no funding allocation initially and will draw resources from the other expenditure category in the case of activation. If an Immediate Response Mechanism (IRM) is established, this component will serve as an IRM CERC to allow the reallocation of uncommitted funds from the project portfolio to the IRM Designated Account (DA) to address emergency response and recovery costs, if approved by the World Bank.

In addition to the project components described above, the team will seek to mobilize additional funds to undertake analytics to further operationalize the concept of urban resilience. Analytics under consideration include: (i) a local political economy analysis at the city-level to better understand the local power dynamics which will help improve the design of a meaningful participatory planning process particularly how to ensure that the most vulnerable groups' voices are heard and better understand the levels of access to services among different population groups; (ii) a study to analyze reasons why previous infrastructure was not properly maintained and inform the development of an effective day-to-day maintenance mechanism for the roads to be financed; (iii) a study on informal economies at the city-level to better understand the scale, location, types of industries, income levels, socio-economic characteristics and needs of the informal laborers, to examine possible economic opportunities for the urban poor and the displaced; and (iv) a citywide land inventory of idle public lands that could be utilized for IDP housing.

2.2 Project Development Objectives

To provide basic infrastructure and improve implementation capacity in targeted areas.

The project would support the rehabilitation of community roads across 17 districts of Mogadishu, the rehabilitation of secondary roads as well as the provision of capacity building support to the Benadir Regional Administration (BRA) to enable this institution to carry out its mandate. The achievement of the above objective would support the Government's efforts to demonstrate visible and tangible improvements in the lives of its citizens which is critical for strengthening the legitimacy of the government and sustaining social and political stability in the country.

2.3 Project Beneficiaries

The immediate project beneficiaries will be the residents of the 17 districts of Mogadishu where the secondary road rehabilitation and construction is being carried out. In addition, approximately 1,800 people will be benefitting from short-term job opportunities resulting from the civil works of these secondary roads. Finally, the BRA staff will be benefitting from the capacity building initiatives in this project.

2.4 Proposed Activities

The proposed Project entails the construction of existing community roads using precast concrete interlock pavement (PCIP).

The likely project activities to implement the ESMF will include:

- Removal of bushes, big stones, grass and other obstacles with actual width of the road reserve;
- Excavation for open drains, backfilling to subsoil drainage systems;
- Removal of unsuitable materials, preparation of roadbed and subgrade;
- Construction of sub-base layer from gravel or crushed Stone;
- Installation of concrete interlocking block including sand bedding for levelling; and
- Curb stone installation

It is likely that land will be acquired temporarily for storage of construction materials, project vehicles and equipment. While some small roadside structures, such as kiosks or vendor tables may need to be displaced during construction, they will all be able to return once works are completed, as the existing right of way is larger than the road carriageway. Thus there will be no permanent resettlement.

3 LEGAL AND POLICY FRAMEWORK

The BRA is a local government established in law and enshrined in clause 1(b) of article 48 of the constitution of the Federal Republic of Somalia, which relates to the structure of the state. It states that:

- In the Federal Republic of Somalia, the state is composed of two levels of government:
    - The federal government level; and
    - The federal member state level, which is comprised of the federal member state government, and the local governments.

Benadir is one of the 18 administrative divisions of Somalia established at independence in 1960. Benadir itself is comprised of 17 administrative districts that make up the city of Mogadishu, which is also capital of the federal republic. The BRA bears the dual responsibility of managing the affairs of the region as well as the municipality of Mogadishu. Thus, its head is dually the governor of the region as well as mayor of the City.

The BRA/MoM currently seeks constitutional clarification on the long-term legal setting of the double role of a regional and municipal entity, drawing on examples from cities such as Berlin, Brussels, Addis Ababa or Washington D.C.

As part of the constitutional provisions and related secondary legislation, there are sound fiscal relations between the BRA/MoM and the Ministry of Finance (MoF), as well as other government entities and authorities in place.

Law Number 6 relates to local government and its older version, Law 19, clearly defines the mandates to provide basic services to the city of Mogadishu. The legal foundations and the derived mandate on road and infrastructure building is disputed by the Ministry of Public Works, Reconstruction and Housing (MoPWR&H). Mogadishu is Somalia's capital and its largest city. As of 2015, it had a population of 2,120,000 residents. The urban area occupies 91 square kilometres (35 square miles), with a population density of around 23,400 inhabitants per square kilometres (61,000 per square mile).

BRA's proactive interpretation and sound execution of the assumed legal mandate is obviously backed by other governmental institutions. Primary, secondary and tertiary road building is assumed to fall under the municipal authority, whereas highway construction and maintenance is attributed to the mandate of MoPWR&H.[14]

Environment Department

The country has an Environmental Department that is responsible for environmental concerns in accordance with existing regulations passed by the former Somali government. It is made up of the following agencies:

- Waste (solid and liquid) Management Department;
- Food and Beverage Control Department; and
- Public Health Department;

[14] Old FGS Laws such as. No. 41/1973 and Law No. 10 are considered to be applicable and in place but contested between the BRA and the MoPWR&H.

The Environment Department issues permits for new construction, reconstruction, rehabilitation and maintenance of old buildings and other civil works to meet environmental regulations

Federal Ministry of Public Works, Reconstruction and Housing

The Federation likewise has a Ministry responsible for Civil Works. The departments and offices are under the Federal Ministry of Public Works, Reconstruction and Housing, include:

- Highways Department
  - Responsible for planning, design and implementing all reconstruction, rehabilitation and new construction of national land transportation networks; and
  - Planning and implementing all reconstruction, rehabilitation and new construction of all airports civil works.
- Housing Department
  - Responsible for planning of all reconstruction, rehabilitation and new constructions of national urban centres; and
  - Planning and implementing of all urban development.
- Engineering Department
  - Responsible for planning, and reviewing of all engineering project design documents;
  - Developing standards, codes and construction regulations; and
  - Developing urban planning policies for national major urban development.

The Mogadishu local government exercise administrative jurisdiction over the municipality of Mogadishu. It has departments that do planning, and infrastructure reconstruction and improvement works. The period after hostilities in the municipality has ceased, saw deliberate efforts by the municipal government to rebuild its damaged infrastructures which includes roads, government buildings, and public utilities; among others. The reconstruction efforts have been made possible through the efforts of the Mogadishu local government and support from donor countries and multi-lateral organizations.

The Project will be implemented under the umbrella of the Mogadishu Municipal Government, which will establish a PIU responsible for the day-to-day management of the Project. Within the PIU will be an Environmental and Social Safeguards Specialist responsible for ensuring that relevant government environmental laws and World Bank safeguard policies are enforced in the project. It is likely that the PIU will carry over much, if not all, of the capacity of the SIUPP predecessor project.

3.1 Relevant Laws, Regulations and Policies

The policy, regulations and legislative framework on the environment in Somalia is ambiguous. The main cause is the continued insecurity in southern Somalia. The region has very little environment-related legislations except for those which were in place prior to the civil war. Those policies could form the basis for reconstituting both the policy and legislative framework, in a more coherent manner. The old policies tended to be sectoral in nature with little consideration for the environment.

The Constitution of the Somali Republic (1960) is silent on environmental concerns, other than in conjunction with natural disasters such as Article 18 “The Environment and the Relief of Disaster”.

Article 18: The Environment and the Relief of Disaster

The state shall give a special priority to the protection and safeguarding of the environment, which is essential for the well-being of the society, and to the care of the natural resources. Therefore, the care of and (the combating of) the damage to the environment shall be determined by law. The state shall undertake relief in disasters such as famine, storms, epidemics, earthquakes, and war.

The Constitution of Somalia (2012) provides for environmental concerns in two Articles, namely:

Article 25

- Envisages that every person has the right to an environment that is not harmful to their health and well-being, and to be protected from pollution and harmful materials; and
- Every person has the right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of these natural resources.

Article 45

- All people in the Federal Republic of Somalia have a duty to safeguard and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and environment of Somalia;
- Take urgent measures to clean up hazardous waste dumped on the land or in the waters of the Federal Republic of Somalia;
- Enact Legislation and adopt urgent necessary measures to prevent the future dumping of waste in breach of international law and the sovereignty of the Federal Republic of Somalia;
- Take necessary measures to obtain compensation from those responsible, for any dumping of waste, whether they are in the Federal Republic of Somalia or elsewhere; and
- 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.

The Constitution mentions that in consultation with the Federal member states that the Federal Government shall adopt a single environmental policy for the Federal Republic of Somalia. This policy is still at the developmental stage.

3.2 World Bank Safeguards Policies

The World Bank has Environmental and Social Safeguard Policies that seeks to avoid, minimize, else mitigate the adverse effects of development projects it is financing. The compliance with these safeguard policies is required among others, to assure that the Project is eligible for World Bank support. The IFC and the World Bank Group have developed a set of Sectoral Environment, Health and Safety Guidelines specific to industries, sectors, or types of projects.

The proposed Project triggers three World Bank safeguard policies which are listed and described in Table 2 below. The WB Safeguard policies that are triggered includes OP 4.01, which requires the conduct of environmental assessment for bank financed projects; OP 4.11, on possible impact to physical cultural resources; and OP 4.12, which governs involuntary resettlement. While the roads for upgrading are existing, and may have a low chance of having

cultural resources buried beneath these access infrastructures, OP 4.11 is deemed applicable due to the need for "chance find" procedures.

Table 1: World Bank Safeguard Policies

Safeguard Policy	Applicability	Rationale
Environmental Assessment (OP/OB/GP 4.01)	Yes	The activities including rehabilitation of existing roads, the temporary acquisition of land and extraction of resources for these activities will lead to short-term, limited reversible economic and potentially physical displacement.
Natural Habitats (OP/BP 4.04)	No	The activities outlined above have no effect on areas of natural habitat.
Pest Management (OP 4.09)	No	It is not anticipated that agricultural chemicals (i.e. pesticides, fungicides, herbicides, etc.) will be used in the rehabilitation of existing urban roads.
Indigenous peoples (OP 4.10)	No	The people in the area are not considered as indigenous peoples.
Physical Cultural Heritage (OP 4.11)	Yes	Civil works, including excavations may not be able to avoid all cultural heritage sites as well as presently unknown sites that can be expected to be found in this area rich of cultural and historical values.
Involuntary Resettlement (OP/BP 4.12)	Yes	The activities may involve temporary involuntary resettlement. No permanent resettlement will be needed, only some small roadside structures (kiosks or tables) may be temporarily displaced during construction but able to return after works are completed. A Resettlement Policy Framework has been prepared. The RPF will provide guidance for RAPs to be prepared once specific road segments are selected.
Forest (OP 4.36)	No	There are no forests within and at the vicinity of the construction area.
Safety of Dams (OP/BP 4.37)	No	The projects do not involve the construction or maintenance of dams.
Projects on International Waterways (OP/BP/GP 7.50)	No	The proposed urban road subprojects are located inland. Water will not be sourced from any international waterway and discharges from construction site is not expected to flow into these international waters.
Projects in Disputed Areas (OP/BP/GP 7.60)	No	There are no records of disputes in the Project area. The country has seen a period of stability and absence of armed conflict.

4 DESCRIPTION OF BASELINE CONDITIONS

The city of Mogadishu, historically referred to Hamar, is located along the Benadir cost of the Indian Ocean.

This chapter provides a description of the baseline conditions in the project area. The first part of the chapter describes the bio-physical environment and the second part the social environment.

4.1 Bio-Physical Environment

4.1.1 Climate

The climate, which ranges from tropical to sub-tropical and from arid to semi-arid, is influenced by the Inter Tropical Convergence Zone. Apart from higher elevations to the north of the country, most of Somalia has a semi-arid to arid climate and is hot and dry throughout the year, with low and erratic precipitation. Average annual rainfall is about 280mm, which can go as high as 500mm in some areas, such as the Ogo highlands[15]. Droughts occur every two to three years and are often followed by severe floods. Climate is the primary determinant for Somali life, and the timing and amount of rainfall are crucial factors determining the adequacy of grazing[16]. There are nominally four seasons, two rainy (*Gu* and *Deyr*) and two dry (J*iilaal* and H*agaa*). The *Gu* rains begin in April and last until June, and these are the main rains with more than 60% of the total rainfall. This season is followed by the *Hagaa* dry period (July-September, which is followed by the short *Deyr* rains (October-November). Next is the dry *Jiilaal* period (December-March), which is the harshest season for pastoralists and their herds.

Mean daily maximum temperatures range from 30° C to 40° C, except at higher elevations and along the Indian Ocean coast. Mean daily minimum temperatures vary from 20° C to more than 30° C. Temperatures to the south are less extreme, ranging from about 20° C to 40° C. The hottest months are February to April, and the coast is usually 5-10° C cooler.

4.1.2 Air Quality

According to WHO's country estimates on air pollution exposure, Somalia's annual median concentration of particulate air pollution is estimated at 16 micrograms per cubic metre.[17]

4.1.3 Geology and Soils

Soils are generally calcareous. Many of the seasonal rivers have rich alluvial soils. Most of the drier parts of the country have thin and relatively infertile desert soils.

4.1.4 Hydrology

While Somalia is predominantly arid and semi-arid, the rivers that exist are critically important. The two main (and only permanent) rivers (Shabelle and Jubba) both rise in the mountains on the eastern side of the Rift Valley in Ethiopia and pass through eastern Ethiopian drylands before entering Somalia. They are the source of seasonal flood

[15] Hughes and Hughes, 1992
[16] FAO-SWALIM, 2015
[17] http://www.who.int/mediacentre/news/releases/2016/air-pollution-estimates/en/

recession farming and irrigation. There are few freshwater wetlands, apart from those associated with the two rivers, and some coastal/marine wetlands in the form of mangroves. The Shabelle River runs near Mogadishu when it is within 30km from the Indian Ocean, before turning south-westward further inland. The municipality has access to the Indian Ocean, which is about 2,385km of coastline.[18] Along this coastline is the country's main harbour where local and international vessels dock and transport goods to and from the country.

4.1.5 Land Use

Mogadishu is mostly an urban area with residential, industrial and commercial areas. It has a total area of about 96,878 km2 and a population of 2.12 million. A study on land use changes in Mogadishu using Landsat imagery indicate that the change in land use over the period 1992-2015, were positive 4% in terms of land area for built-up areas; underdeveloped areas has also increase by 8.71%, while desert and vegetated areas decreased from -1.01% and -13.04% respectively[19].

4.1.6 Biodiversity

Most of Somalia is located within the Horn of Africa Biodiversity Hotspot. Only a small portion of the south-west which falls into the coastal forests of Eastern Africa Hotspot is not included. This hotspot is composed of the countries Djibouti, Ethiopia, Eritrea, Kenya, Oman, Somalia and Yemen, and had been a renowned source of biological resources for over thousands of years. It is only one of two areas that is home to a number of endemic and threatened antelope (beira, dibatag and Speke's gazelle), and holds more endemic reptiles than any other regions in Africa. However, it is also one of the most degraded hotspots on Earth with only 5% of its original habitat remaining.

Mogadishu is a highly-urbanized area with residential, industrial and commercial areas. Earliest historical records indicate that the ancient city of Sarapion which is believed to be the predecessor of Mogadishu had existed even during the first century A.D.[5] Since then the local inhabitants had converted this historical land into a bustling port City. Whatever environment that existed during those times had been converted to an urban eco-system, devoid of its original vegetative cover and biodiversity.

Similarly, the terrestrial animals would have fled the area as a result of the destruction of their habitat, or had been hunted down by the early settlers who subsisted as hunter-gatherers. Subsequent waves of human settlers are farmers-pastoral communities. It is for this reason that faunal species observed in the outskirts of the Project area are those that had been domesticated by man. Within the urban environment, what remains are mammals used as pets (i.e. dogs, cats, birds, etc.) by local people.

4.1.7 Protected Areas and Sensitive Habitats

As mentioned in Section 4.2.6 (Biodiversity), most of Somalia is located within the Horn of Africa Biodiversity Hotspot. However, it is likewise among the most degraded environments with only 5% of its original habitat remaining. Currently, there are no sensitive environments that can be found within the Project area.

[18] https://www.cia.gov/library/publications/the-world-factbook/geos/so/html
[19] Iopscience.iop.org/article/10.1088/1755-1315/37/1/012063/pdf

4.2 Social Environment

4.2.1 Population

The United Nations Population Fund (formerly the United Nations Fund for Population Activities) estimated that in 2014 the total population of Somalia was 11,800,833; which is broken down to 1,830,073 for Puntland; 3,508,180 for Somaliland and 6,462,580 for Jubaland and the rest of Somalia (UNFPA Population Estimates Survey of Somalia 2014). Table 4.2 contains the breakdown of the population of Somalia in 2014 based on the UNFPA survey.

Mogadishu on the other hand has an estimated population of about 2.12 million inhabitants with a population density of about 23,400 persons per square kilometre.[20] More than 60% of the population in Somalia is less than 25 years of age, it also has the highest fertility rate at almost 6 children per woman.[21] Likewise, Mogadishu is currently the second fastest growing city in the world.[22]

Table 4.3: Population Estimates

Region	Population
(Jubaland) + (rest of) Somalia	1,360,633 +5,101,947 (6, 462, 580)
Somaliland	3,508,180
Puntland	1,830,073
TOTAL	**11, 800, 833**

Internal Displacement due to Armed Conflict

The humanitarian crisis in Somalia is among one of the more complex protracted emergencies in the world. Ongoing, low-level conflict across the country and endemic environmental hazards render the majority of the country's people chronically or acutely vulnerable.

UNOCHA estimates that 1.1 million people are in long term displacement and will continue to face critical levels of vulnerabilities with poor access to basic services and livelihood. Further, the country continues to register new displacements as a result of armed conflict and cyclical natural disasters. For instance, in July 2015, new military operations led to the displacement of more than 42,000 people in Somalia.

Endemic inter-clan fighting for control of land, pasture or water sources also continues to lead to casualties and displacement of civilians. Displaced people are particularly vulnerable, unprotected and exposed to exploitation and abuse. Many have gone through multiple displacements from their homes for decades, are marginalised and at risk of human rights violations including forced evictions, discrimination and pervasive gender-based violence (GBV). Family separations, GBV against children, forced recruitment and abductions are among the main violations against displaced children. In addition, GBV is particularly high in Internally Displaced Person (IDP) settlements. UNOCHA notes that 75% of all GBV-survivors are IDPs.

More than 1.2 million Somali refugees are also living in neighbouring countries within the region and in Yemen, and some are increasingly under pressure to repatriate. Refugees and

[20] https://en.wikipedia.org/wiki/Mogadishu
[21] 2017 CIA World Fact Book
[22] The Guardian, "Where is the fastest growing city in the World", 18 November 2015,

returnees fleeing the Yemen crisis continue to arrive in Somalia. As of late November 2015, UNOCHA estimates that nearly 30,000 people fleeing the crisis had arrived in Somalia and elsewhere. Due to practical considerations related to humanitarian access, tangible re-integration support and assistance are only provided in areas of the country with relative stability and where UNHCR and partners are currently present, and/or can establish operations. For this reason, re-integration programs are being undertaken in selected districts of southern and central Somalia.

Land issues, inter-connected with political developments, are at the root of inter-communal conflict, marginalisation of minorities and the most vulnerable, and cyclical displacement. While recent military and political trends have exacerbated land issues, many of the tensions are rooted in more historical competition over land and water between neighbouring communities. Displacement as a result of violence and forced evictions due to land tenure insecurity are increasing, with the scale of forced evictions of IDPs and the urban poor from public and private land and buildings in Mogadishu and other urban areas increasing. In 2015, more than 116,000 people were forcibly evicted. Land tenure insecurity remains one of the key obstacles to local integration and other solution processes for displaced people and cause further rights violations, such as destruction of property and family separation as well as destruction of humanitarian investments, such as water, sanitation and hygiene facilities.

Historically, possession of individual title deeds was largely confined to urban and politically-connected elites with such deeds probably cover less than 10% of the land currently in dispute, therefore many marginalised communities have no access to land and property rights, as well as involvement in the current state formation process. Secure land tenure and property rights are vital to ensure that solutions to cyclical displacement are provided in the short, medium and long-term.

Although predominantly a rural-based society, there are strong patterns of rural-urban migration. For a time during the war, this process was reversed as people fled the towns to areas from where their clans originated. Consequently, the population of previously small regional towns such as Belet Weyne, Galkaayo, Baidoa, and Bosaso rose dramatically as people fled fighting in Mogadishu, the Lower Jubba, and the inter-riverine areas. There are no recent census data, so it is difficult to assess urban growth and rural - urban movements, except to say that it is high and exacerbated by returnees coming back to the towns and cities. It is suggested that urban growth may be as much as 10% per annum. Urban centres have, relatively, much better access to services but the growth of urban centres has placed significant pressures on the catchment area (for fuel, food, water, livestock etc.) of the different urban centres.

In 2016, it was estimated that there were about 80,657 internally displaced households made up of 464,486 individuals that are residing in 486 settlements in the 17 districts of Mogadishu.[23] Most (55%) of the IDPs are found in two districts (Daynille and Kaxda) which are located in the outskirts of Mogadishu. The other districts also have a number of displaced persons but not as many as these two. Settlements in these 2 districts have hosted a significant number of IDPs that first settled in the central districts of the City but were evicted by the host communities. These IDPs have mostly migrated to Mogadishu primarily due to security reasons (85%); secondly for economic reasons; and lastly as returnees/refugees.

[23] www.jips.org/system/cms/attachments/1181/original_original_Mogadishu_Profiling_Report_2016.pdf

Impact of Project road construction to local population

The rehabilitation of the existing urban main roads is not expected to cause land acquisition nor displacement of local residents. While it is possible that a few roadside kiosks may be affected during the construction phase, these may just be temporary resulting from the installation and operation of temporary construction facilities and development and exploitation of the quarry site. Nevertheless, social safeguards as defined in the RPF and RAPs that will be prepared once specific road segments are selected will guide Project owners in resolving resettlement issues that may arise from the implementation of the Project irrespective if the affected persons have recognizable titles to the land that they occupy.

Prior to the start of construction, meaningful public consultation meetings have been conducted to inform the stakeholders, especially the most affected persons, on the impact such undertakings will create and the measures proposed to be carried out by the implementers to avoid, minimize, else mitigate the adverse effects, including compensation for damages, and relocation if necessary. Proper coordination with the peace committees is essential to secure the cooperation of the local populace, especially in the planning and implementation of the resettlement plan to be prepared for the Project.

4.2.2 Economy and Poverty

The United Nations had classified Somalia as a least developed country. Agriculture is the most important sector, which accounts for 65% of GDP and employs 65% of the workforce. The economy is based mainly on livestock and remittances/money transfers from abroad, and telecommunications. Livestock contributes about 40% to GDP and more than 50% of export earnings. Similarly, Somalia is the world's fourth-most remittance dependent country, which makes up about 20-50% of local economy.7 Remittances alone was estimated at USD $1.3 billion for the country as a whole, not only provide a buffer to the economy but also are a lifeline to large segments of the population cushioning household economies and creating a buffer against shocks. Telecommunications on the other-hand had been developed in the country primarily by private entrepreneurs with their foreign investors from China, Korea and Europe. These facilities not only transmit electronic messages and data, these also are used to do money transfers. The telephone density in the country is much denser than its neighbouring countries.

In 2015, less than a third of the donor commitments were actualised due to lower oil prices and bureaucratic hurdles. Domestic revenue is still insufficient to allow the government to deliver services to citizens. The administrative and security sectors account for more than 85% of total spending while economic and social services sectors account for about 10% of total expenditure. Poor collection capacity, narrow tax base, absence of the necessary legal and regulatory frameworks, and lack of territorial control hinder full revenue mobilisation (World Bank 2016).

Poverty levels in the country is very alarming. UNDP in its 2014 report mentioned that the country has a poverty rate of 73%, a life expectancy of 55 years, adult literacy of 31.8%, about 70% of the population is below the age of 30, and a youth unemployment rate of 67%. In its 2012 report, UNDP Somalia mentioned that the country had one of the lowest Human Development Index (HDI) in the world with a value of 0.285. Inequality is high driven by the

difference in poverty incidence in urban settings (close to 60% in Mogadishu) and rural settings (52.3%) with IDP settlements (71.0%).

The food security situation has been worsened by the civil war and statelessness, and recurrent droughts, as farmers have lost access to agricultural inputs and services formerly provided by the state. The private sector has responded to a degree, but the lack of regulation might have led to misuse, and poor quality control. While industry can provide an increasingly important contribution to economic growth, it will be, for the foreseeable future, second to pastoralism and agriculture.

The Project can have a positive effect in alleviating poverty in the municipality. While temporary disruptions of local resident's lives in terms of construction related impacts, these are only temporary can be mitigated using standard engineering practices.

4.2.3 Gender

Somalia has one of the highest gender inequality in the world at 0.776 which ranks 4th in the world. The country has an extremely high maternal mortality, rape, female genital mutilation and child marriage rates, and violence against women and girls is common. The participation and roles of women in politics and decision making is minimal which perpetuates limited female roles and inequality. Women make up 56.6% of the workforce in agriculture/pastoralism which constitutes 60% of the local economy. The number of women working in government had significant numbers at 1,912 (19%). Much is to be desired in the education sector, where only 36.1% of pupils in the upper primary education are composed of girls. Gender disparity is higher in upper grades due to economic constraints and early marriage.

The Project should make a positive impact for women in terms of providing safe and convenient access facilities to basic social services (education, health, government offices, etc.), and reducing travel time which women can use the saved time for productive purposes (i.e. second livelihood, school tutorial services for their children, etc.).Temporary inconvenience due to vehicular traffic and limited emissions during construction work should easily be managed by the contractors using mitigation measures to be defined in the environmental management plan.

4.2.4 Social Services

Water and Sanitation

The African Development Bank in its *Country Brief 2013-2015* noted that the unavailability and inappropriate management of water resources poses a serious and growing threat to sustainable development, aggravated by recurrent devastating droughts and irregular rainfalls that vary by location and season.

Somalia suffers from acute water shortages, with the available water being mainly saline. Since 1991, the vital water points for drinking and cultivation purposes have not received appropriate maintenance by government authorities. Southern Somalia is generally greener, with two permanent rivers, the Jubba and Shabelle, which are shared with Ethiopia. These rivers and the underground aquifers are widely exploited. The remaining water courses are ephemeral, yet provide important water sources (wells) and account for relatively richer vegetation in their

vicinity. Less than 50% of the urban population has access to safe water and improved sanitation and even less in the rural areas.

During the late dry season many wells become saline, and cause diarrhoea and other water-borne diseases. Since less than half of the population have sanitation or waste management, the risks to human health from poor sanitation are real. Human and household waste disposal sites are generally too close to dwellings and water sources. The years of insecurity resulted in the near complete breakdown of waste disposal systems, and accumulations of waste pose health and environmental risks. There is also a lack of garbage collection and proliferation of plastic bags. Seepage from waste dumping sites is a potential contaminant of ground and surface water resources.

The proposed subproject sites do not traverse these natural waterways, nor the coastal area fronting the Indian Ocean. Likewise, these proposed infrastructure subprojects are not expected to discharge any of their construction effluents into these bodies of water which are essential to the local populace's domestic requirements.

Health

The *UNDP Somalia Human Development Report 2012* notes that critical public health, nutrition and water services are insufficient. There is an immediate need to access to essential health services for some 3.27 million people (the data are not disaggregated beyond country level) with health capacities severely overburdened, stocks diminished and services disrupted especially in conflict, drought and flood-affected areas, especially for IDPs.

There is a plan to reach about 1.8 million people--or 56 % of the people in need--through provision of primary and secondary health care services, focusing on displaced people, host communities, under-served rural and urban areas (including newly-recovered areas) and drought-affected people. Health care for the most vulnerable people, especially girls, women and boys, is provided through international and national partners, UN agencies. While the NGOs remain the prime provider of health care services in Somalia, all partners provide key front-line health services in targeted geographical areas, including mobile medical units for services in hard-to-reach and overwhelmed areas, camp-based clinics, and support to existing facilities unable to cope with increased demands. These provide life-saving health care services for the particularly vulnerable, such as primary health care, emergency reproductive health and nutrition and trauma care. The delivery of health services by all in the health sector is expected to continue to be aligned with the regional Health Sector strategic plans.

Access to health care is facilitated by good quality roads, which is the output of the proposed subprojects. These access infrastructures can make the movement of people, health workers, medical supplies and equipment more convenient and comfortable most especially for accident victims who need to reach a medical facility with the least possible time.

Education

The formal education system in Somalia collapsed in 1991. Somalia education indicators and rankings are among the lowest in the world (World Bank 2012). There has been a steady decline in both the standard and provision of formal education services and poor quality education and the lack of jobs are major sources of tension for thousands of youth, though there are significant improvements in Somaliland.

With an estimated adult literacy rate of 24% (AfDB 2015) Somalia still ranks among those countries with the lowest levels of adult literacy worldwide. Local administrations and communities cooperate with external donors, including the Somali diaspora in rehabilitating primary and secondary schools and have initiated campaigns to improve women's education. Vocational and private schools are opening to cater for the short fall in formal education institutions, and Koranic schools have helped fill the gap.

Infrastructure

The effect of over 30 years of strife, drought and other natural disasters is reflected in the poor state of the country's infrastructure and service systems. Somalia's transportation hub is poorly developed and often in poor state of repair. At independence, Somalia inherited a poorly developed transportation system consisting of a few paved roads in the more populated areas in the south and north-west, four undeveloped ports equipped only with light facilities, and few usable airstrips.

Insecurity remains the most significant constraint to road development, seasonal rains and poor maintenance render some roads in Somalia impassable between March to May and October to November annually. Limited and highly dilapidated road and airport/airstrip infrastructure also serve as major constraints. Poor road quality increase vehicle operation and transportation costs for humanitarian agencies delivering relief supplies to affected towns. They also increase commercial food prices as traders transfer the high vehicular maintenance cost to consumers, making it difficult for vulnerable people to access essential goods and services. Road blockages have also continued to disrupt the means of livelihoods of local communities, rendering them dependent on humanitarian assistance and more susceptible to malnutrition and food insecurity. For example, in July 2015, according to FAO, the blockades resulted in the deterioration in the food security situation accompanied by acute malnutrition in parts of Somalia.

The implementation of the proposed road rehabilitation subproject covering a number of Mogadishu's urban roads will be essential to enhance the vital link for the local people to basic social services. The rehabilitated roads will reduce vehicular maintenance cost, reduce travel time and make the movement of persons, goods and services more convenient thereby benefiting the local population and facilitating the growth of local economy.

4.2.5 Land

Land in Somalia is traditionally held by clans that occupy certain territories. These lands are allocated by the clan to its members for their use but no titles are issued. The Land law that was enacted in the country during the time of the dictatorship declared all lands to be State-owned. Households are obliged to register their landholdings and will be issued a stewardship document over a limited track of land. Pastoral and agro-pastoral communities were hesitant to register their lands for fear of being deprived of such assets. Corrupt government officials and influential groups took advantage of this law to acquire properties. However, after the collapse of the central government, enforcement of this law had not been possible. The clans and sub-clans had reverted back to the traditional practices especially in the rural areas.

The proposed subprojects entail the rehabilitation of existing roads that should have established rights of way (ROW). Unless the proposed works will require widening of the existing width to increase vehicular conveying capacity or improvement of road geometry, then any other rehabilitation works will only require temporary land acquisition for the location of temporary construction facilities (i.e. construction materials and waste storage area; field office, worker's accommodations, construction yard, garage, etc.), which can be restored to their pre-project

conditions after the work has been completed. The nature of the resettlement work will be determined during the detailed design phase, when the exact dimensions of the subproject roads, and construction schedule and methods have been determined. However, while some small roadside structures, such as kiosks or vendor tables may need to be displaced during construction, they all will be able to return once works are completed, as the existing right of way is larger than the road carriageway. Thus there will be no permanent land acquisition or resettlement.

5 POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

This Section contains a preliminary summary of the impacts that are likely to result from the Project activities as a result of the interaction between the Project components and the environmental and social receptors. It should be noted that the impacts identified here are preliminary in nature.

5.1 Environmental Screening Criteria

Environmental screening was carried out using a set of evaluation criteria. The screening criteria included the following:

Environmental Aspects

- Sensitive areas, natural habitats, declared forest reserves
- Felling of trees/clearance of non-agricultural vegetative cover
- Impacts on seasonal (non-perennial) streams/rivers

Social Aspects

- Loss of or access to lands including residential and commercial lands;
- Loss of livelihood
- Loss of cultural/historical resources;
- Damage or even loss of common property resources;
- Risk of conflict; and
- Social exclusion and even displacement especially for IDPs by major clans.

The screening of the potential sub-projects must be done prior to selection for funding by SURP. For instance, Category B Projects will result in adverse environmental impacts on human populations or environmentally important areas (including wetlands, forests, grasslands, and other natural habitats) that are less adverse than those of Category A projects which are more severe in the light of the core investment activities of the Project (these typically include infrastructure related to oil and gas, power connections, road improvements, water works, etc.). Sub-project screening should follow the World Bank Operational Policies OP 4.01 and OP 4.12 (for Environmental Assessment and Involuntary Resettlement, respectively).

In general, Category B impacts are localized, do not affect sensitive area/resources, and are reversible, unlike Category A projects. Category B projects may typically require only an ESMP. It is not anticipated that the any roads will require an ESIA, as they are generally less than 1 km and are upgrading of existing roads.

Category C projects are generally benign and typically do not require environmental assessment. However, all such sub-projects should be screened to determine if specific environmental management plans (e.g., waste management plan) are required.

5.2 Project-Level Environmental and Social Reviews

The application of the ESMF to the investment sub-projects enables preparation of standardized environmental and social assessment documents for review and approval of funding agency. Sub-projects that trigger WB safeguard policies which normally results in significant environmental and social impacts, are sited in environmental sensitive areas, or

cause significant physical and/or economic displacement of local people, can be identified, systematically classified and appropriate environmental assessment instrument prescribed.

To this end, all sub-projects that are classified as Environment Category A will not be considered for financing under this Project.

During detailed design, any environmental and social issues that may arise will be addressed through an ESMP. The environmental and social management measures through the ESMP should be included as part of the scope of work in the bidding documents with corresponding budget, to ensure implementation. The contractor will be responsible for preparing ESMP using its own organization, or contracting this service to a competent preparer (person or organization) in accordance with the ESMP Template provided in Annex 1.

The mitigation and enhancement measures to address the anticipated adverse and positive impacts, will need to be properly organized into workable plan. A template for the impact and mitigation matrix to be part of the ESMP is provided in Annex 2. In the event the environment ministry of Somalia has a report format different from the Bank, then a separate report can be prepared to comply with this requirement but should contain the same elements as a minimum.

Before any ESMP is submitted to the Bank, it should first be reviewed by the Project Owner through its PIU, where only the approved report is forwarded to relevant national entities such as the Ministry for Environment, Wildlife and Tourism; for review and approval, along with all the relevant supporting documents. All ESMPs are subject to the reviewed and approval by the Project owner and the World Bank prior to inclusion into the bidding documents, and implementation.

Each sub-project ESMP will be translated into the Somali language for hyper-local distribution.

5.3 Potential Impacts

The Project is envisaged to have a range of positive and negative environmental and social impacts. Some of these are a direct result of subproject construction activities which can be mitigated or enhanced, while others are a consequence of Project designed which can be avoided or minimized if a possible suitable alternative design is developed.

5.3.1 Potential Positive Impacts

There are positive impacts that can arise from the Project implementation. Some of the benefits that could result from the Project implementation will include:

- Reduced travel time which can provide local people especially women more time to do other productive endeavours;
- Reduced Vehicular Maintenance Cost due to improved road conditions, that translates to lower transport cost for goods, services and passengers;
- Increased household incomes due to reduced transport cost; and
- Local people can have a more convenient means of accessing basic social services (i.e. schools, hospitals/health centres, etc.).

5.3.2 Potential Negative Impacts

The potential negative impacts that could result from the Project are presented in in Annex 2. **The** The ESMP shall provide further specific details when the exact sites and magnitude of the

sub-projects are known including their impacts during the operational phase and the significance assessed. General Environmental Conditions for Construction Contracts are provided in Annex 3 and should be attached as an Annex to all sub-project ESMPs and bidding contracts.

5.4 Assessment of Project Alternatives

One of the basic WB safeguard policies is avoidance and minimization of adverse environment and social impact for Bank financed projects. This can be done by reviewing project alternatives, modification of project designs or road alignments. It is only when such actions are unable to find other viable options to the proposed project and its components, will mitigation be considered. This assessment requires a systematic comparison of possible project configuration that includes design, location, technology, possible construction methods, and sources of materials and so on, in terms of their adverse impacts and feasibility of their mitigation, cost, suitability under local conditions and institutional capacity of implementers in carrying out the work and monitoring. For each alternative, the environmental and social cost should be quantified where possible and economic values attached where feasible, and the basis for the selected alternative identified. The analysis of alternative should include a NO ACTION alternative. The analysis of alternatives is contained in the feasibility studies for the roads in Mogadishu.

5.5 Approach to Developing Mitigation Measures

Options to address the various environmental and social issues identified have been worked out based on review of good practices and requirement of compliance with the legal provisions as well as consultations with the relevant stakeholders. The principle that guides the approach to mitigation measure development is outlined in Table 3. Possible mitigation measures are provided in Annex 2.

Table 3: Approach to Mitigation Measure Development

MITIGATION MEASURE	PRACTICE
Seek viable alternatives first to avoid or minimize particular adverse impacts	• Consider viable alternatives to a proposed Project and its component that can avoid or minimize adverse impacts prior to accepting appropriate mitigation These alternatives should also be able to achieve the Project objectives to maximize benefits and at the same time minimize undesirable impacts
Take corrective measures to minimize unavoidable effects.	• Limit the scope of the work to within the Project influence area. If the impact extent is undetermined or goes way beyond the Project area, in most likelihood, the sub-project is a Category A which is not eligible for funding under the Project • Consider doable corrective measures intended to reduce adverse impacts to acceptable government and/or international standards. • Seek existing effective mitigation measures already applied in on-going Bank financed projects. The list of best practices is a good source of these information.
Public Consultation	• Conduct public consultation meetings to disclose proposed preliminary mitigation measures, seek comments and suggestions from stakeholders on the proposed measures especially those that directly affect them (i.e. mode of resettlement, rates applied for compensation of loss assets, location of waste disposal sites, etc.)

5.6 Gender Mainstreaming

The rights of women are protected in the Provisional Constitution. Women are given the right to education, allowed to work, own properties, hold public office, and receive inheritance.

Under the Project, if disparity between men and women occur during implementation such as priority in hiring, pay rates for similar work done, safe working environment, health and sanitary facilities in the work place and office and others, then there is a need to mainstream gender concerns in the project. To do this, there is a need to conduct a study to identify and assess gender issues and opportunities in the project and the locality. The results of the study would serve as guide in adopting and updating the African GAP into all stages and components of the Project. The updated plan should identify the project activities and its impacts on women, and propose mitigation and enhancement measures, name point/focal persons/organizations responsible of carrying out the measures, name verifiable indicators to monitor performance, prescribe implementation time frame and budget. The GAP comes with it, a monitoring program that will help decision makers keep track of the GAP implementation in order to assess if the mitigation is effective, else alternatives measures need to be put in-place. Annex 5 outlines some information that should be provided in an assessment of the challenges and opportunities for gender concerns.

The primary objective of the vulnerable persons assessment and assistance measures is to avoid the occurrence of Project-induced vulnerability, and if it occurs, to mitigate this through preventive and follow-up measures.

Criteria used to assess Project-induced vulnerability include pre-Project poverty, household composition, income, food supply, housing, social support, and health. In addition, marginalization of affected households due to temporary/permanent displacement during the construction phase. The criteria are used to establish household vulnerability relative to local conditions. Vulnerability thus becomes locally defined as those households that are recognized to be in a difficult situation against the background of general poverty in the area.
Vulnerability should be viewed in two stages: pre-existing vulnerability and transitional hardship vulnerability. Pre-existing vulnerability includes that stage which would be present with or without Project development. Transitional hardship vulnerability occurs when those directly affected by the Project, whether predisposed or not, are unable to adjust to new conditions due to shock or stress related to Project activities.

Project measures to identify vulnerable households and individuals include:

- Participatory engagement techniques to confirm community perceptions of well-being and to identify at-risk households
- Analysis of baseline data to identify at-risk households
- Implementation of household monitoring surveys designed to reveal trends in social welfare (household composition, assets, sources of income, expenditures….)
- Self-registration of households that identify themselves as vulnerable or at risk; with all such registrations leading to an evaluation of that household by the Project/investor team in order to assess the households' vulnerability
- Regular visits to all physically-displaced households and any economically displaced households identified as vulnerable during resettlement planning and implementation processes to re-assess those households' vulnerability. Such visits will occur at least once a quarter; and each visit will be recorded in the database flagging changes to indicators that are problematic.

5.7 Chance Find Protocols

In the event of chance finds of items of cultural significance (e.g. religious shrine, archaeological site, cemetery, etc.), all forms of excavation in and around the site will be stopped. Subsequently, experienced archaeologists and anthropologist would be recruited to carry out an investigation and proposed plans for the protection and preservation of such cultural artefacts (Annex 4).

During the Project site induction meeting, all contractors will be made aware of the presence of an on-site archaeologist who will monitor earthmoving and excavation activities.

The following procedure is to be executed if archaeological material is discovered.

- All construction activity near the find/feature/site will cease immediately;
- The discovered find/ feature/ site will be delineated;
- Record the find location, and all remains are to be left in place;
- Secure the area to prevent any damage or loss of removable objects;
- The on-site archaeologist will assess, record and photograph the find/feature/ site;
- The on-site archaeologist will undertake the inspection process in accordance with all Project health and safety protocols under direction of the Project Health and Safety Officer; and
- In consultation with the statutory authorities the on-site archaeologist will determine the appropriate course of action to take.

6 PUBLIC PARTICIPATION/CONSULTATION

6.1 Introduction

A key factor that exists in all successful project development and implementation is meaningful participation by all stakeholders. The more active involvement of the local level people in the planning and management processes, the greater the likelihood that resource use and protection problems will be resolved as well as the likelihood of development opportunities occurring in a balanced manner that benefit most communities affected by the project.

In line with the requirements of the World Bank Safeguards for Environment Category B projects, the preparation of this ESMF included the conduct of public consultations involving Project stakeholders such as relevant government agencies, beneficiary communities, mass organizations residing/operating/having jurisdiction within the Project area; and World Bank and UNOPS representatives. The consultation process began on 17 May 2016 and continued until January 2017. The minutes of the public consultation meeting are found in Annex 7.

6.2 Objectives

Specifically, the objectives of the public participation included:

- Documentation of stakeholders' opinions/views and concerns on the Project;
- Seeking consensus on some issues such as cut-off date, compensation rates, mode of relocation, participation of stakeholders in the Project, etc.;
- Obtaining local and traditional knowledge that may be useful for Project planning and implementation;
- Seeking acceptability of Project alternatives, mitigation measures and trade-offs;
- Ensuring that important impacts are not overlooked, and that benefits are optimised;
- Minimizing possible future conflict through the early identification of contentious issues;
- Providing an opportunity for the public to influence the designs and implementation in a positive manner;
- Improving transparency and accountability in decision-making; and
- Increasing public confidence in the Project.

6.3 Mechanism for Participation and Consultation

Public participation/consultation is considered a fundamental tool for managing dialogue between the Project developers and the public, and for building understanding and improving decision-making by actively involving individuals, groups and organisations having a stake in the Project.

It is important to ensure clarity on the following concepts: *public participation* and consultation and *communication* that are frequently confused with each other and that should be kept separate.

- *Public is a more interactive and intensive process of stakeholder engagement.*
- *Consultation* is basically a two-way process in which the ideas and concerns of stakeholders and the sub-project designers are shared and considered.
- *Communication* involves dissemination of information from the sub-project proponents to the concerned public.

For this ESMF and subsequent safeguard instruments to be prepared, public participation strategy for the Project centres on the provision of a full opportunity for involvement of all stakeholders, especially the direct stakeholders. Therefore, as a matter of strategy, public participation will be an ongoing activity taking place throughout the entire project cycle. The consultation process will ensure that all those identified as stakeholders are consulted directly. There are many ways that could be used for involvement, consultation and communication as listed below:

- Meetings;
- Completion of questionnaires/application forms;
- Public readings and explanations of Project ideas and requirements;
- Making documents publicly available at the national, local and community levels at suitable locations;
- Newspaper announcements, preferably all local papers;
- Notice boards near Project locations;
- Posters located in strategic locations; and
- Public places frequented by community, radio and local television;

Any of these means should take into account the prevailing literacy levels in the communities by allowing sufficient time for responses and feedback and putting messages in the relevant language (s). Any opinion and complaints coming from the population must be documented, and utilised in decision making.

There should be specific events (preferably community-level meetings) at which affected people will feel comfortable expressing their views. Such events should be carefully documented by written minutes, recordings, video recordings, etc. and the minutes of these meetings together with attendance lists should be included in the environmental and social assessment instruments (ESMP and RAP or ARAP) as proof that public consultation has taken place. The ESMP and ARAP will explicitly show how ideas from public were taken into account. There is no requirement to accept every suggestion or demand made, though reasonable suggestions should be taken into account as a matter of good faith.

6.4 Identifying Stakeholders

Stakeholders for the purpose of this Project are be defined as all those people and institutions that have an interest in its planning and execution:

- Local Residents
- Project affected communities
- Religious leaders
- Districts Peace Committees
- NGOs/CBOs
- BRA/MoM

While the ESMF consultations and stakeholder engagement provide stakeholders with the general understanding of the Project, as well as the opportunity to contribute to the planning process and express their (community) concerns and issues on the Project. Subsequent ESMPs consultation and stakeholder engagement will addresses same issues specific to individual sub-projects. Table 4 below, provides a mechanism for the identification of Project key stakeholders:

Table 4: Identifying Key Stakeholders

WHO	HOW TO IDENTIFY THEM
People living in the vicinity of the proposed works	• Field Survey • Identify the local government area (s) that the proposed road subproject falls within • Review available data to determine the stakeholder profile of the stakeholder or relevant group • Use identified groups and individuals to tap into stakeholder networks to identify others
Special interest groups	• Identify key individuals or groups through organised groups, local clubs, community halls and religious places • Organisations such as environmental groups will be aware of similar local groups or individuals
Individual people who own properties that will be directly or indirectly affected	• Advertise in local newspapers, telling people that they may be affected and asking them to register interest in attending meetings or receiving further information
Business (owners and employees)	• Field Survey • Municipal lists or property registers
Ministries, Departments, Agencies	• Constitutional Responsibility/ministerial mandate

6.5 ESMF and Public Participation

During the course of the preparation of this ESMF, key stakeholders were consulted. The record of consultation is outlined in Table 5 and Annex 7 contains photographs taken during some of the meetings, along with the highlight of such activities.

Table 5: Consultation Record

LOCATION	STAKEHOLDERS	DATE
Mogadishu	Municipal Council, Ministries and Agencies	17 May 2016
Mogadishu	Municipal Council, Ministries and Agencies and others	4 March 2017

During the initial meetings in May 2016, the following topics were discussed:

- Project's objectives in terms of stakeholders' needs and concerns;
- Feasible alternatives (in particular alternative locations) and their relative merits in terms of environmental, social and economic factors;
- Environmental and social issues and establish the scope of future studies and/or site specific management plan; and
- Processes for continued stakeholders" involvement.

Generally, with regard to stakeholder's perceptions about the Project, there was a general acceptance of the Project across the locations visited and groups met. The Project development objectives, scope and safeguard concerns were extensively described to all the stakeholders that includes local communities in the visited locations. The highlights of the meetings are found in Annex 9.

6.6 ESMF Communication Plan

The ESMF Communication Plan refers to specific guidelines and protocols consistent with the principles of participation that will be pursued in the Project. Included in the Communication Plans, will be the disclosure of the Social Safeguard Framework of the Project. Among the topics to be included in the Communication Plan are:

- Establishment of feasible participation mechanisms;

- Participation mechanisms prepared with the basic objectives of transparency, responsibility of delivery of public service and an anti-corruption approach;
- Promotion of fora for dialogue based on realistic expectations; and
- No discrimination for vulnerable groups, such as women, youth, older persons, disabled, displaced populations, minority clans, and indigenous communities.

6.6.1 Tools for Consultation of Stakeholders

Depending on the target stakeholder and objective of consultation, one or a combination of the following tools can be used during the conduct of consultation.

Table 6: Tools for the consultation of stakeholders

STAKEHOLDERS	CONSULTATION TOOLS
Municipal Government	Phone calls, e-mails, visit, facilitated meetings, electronic media
Project Implementing Unit, Contractors	Phone calls, e-mails, visit, meetings, electronic media
Local residents, Project affected persons/entities, market/vendors, squatters Vulnerable groups/women/youth	Focus group discussions, interview using questionnaires, worship centres, community town hall meetings, print materials, and texting by phone

6.6.2 Future Consultations and Communication

Consultation will continue before, during and after Project implementation. The Project is required to provide relevant materials in a timely manner prior to consultation and in a form and language that are understandable and accessible to the groups being consulted. For the subprojects, the materials are to be translated into the Somali language.

This requirements and phasing of consultations are as follows:

Pre-Implementation

- Organisation of public stakeholder workshops and comments incorporated into final ESMF;
- During the preparation of individual ESMPs;
- Interested groups and communities affected will be informed about the proposed sub-projects and their respective activities, how they could be impacted; appropriate mitigation measures proposed, and implementation time frames;
- Consultation on the draft and final ESMP; and
- Translation into Somali language and Public disclosure of Final ESMF (approved by WB) in-country at designated centres accessible to stakeholders and at the WB Info Shop (English version).

During Implementation

- Stakeholder communities will be informed about the date/schedule of Sub Project commencement, especially those who will be involved in the monitoring and evaluation of prescribed mitigation measures;
- During the actual monitoring and evaluation of the ESMP implementation, to determine the environmental performance of the contractor, effectiveness of the ESMP, and if there is a need to revise the ESMP (during mid-term project review or as the need arises); and
- Performance Audit of ESMP (after every 6 months after the commencement of civil work
- Public participation within the Project cycle is indicated below.

PROJECT CYCLE	ESIA COMPONENT	PUBLIC PARTICIPATION ACTIVITY
Pre-Feasibility	Environmental and Social Screening	Identifies public groups and begins initial contact with groups.
	Initial Environmental Examination (IEE)	Continue consultations – public provides input to IEE report.
	Scoping	Identifies major issues for Scoping and TOR using public input and makes plan for public involvement.
Feasibility	ESMP	The public reviews and comments on draft ESMP study report. The public provides input to design and survey.
Detailed Survey and Design	Integration of Environmental Mitigation Measures	Detailed design made available to the public.
Construction and Operation	Environmental and Social Monitoring	The public provides input to post evaluation of impacts and mitigation measures.

7 ESMF IMPLEMENTATION AND MANAGEMENT

7.1 Introduction

The successful implementation of the ESMF as a guide in the preparation of appropriate ESMP depends on the commitment of the concerned institutions in carrying out their respective roles, as well as the capacity of these units to do the job effectively. An institutional arrangement had been proposed that clearly states the roles of these stakeholders though out the Project cycle. Also, the capacity building activities have been devised to ensure that the units/ organization assigned to perform the relevant tasks are capable of doing so.

7.2 Institutional Arrangements

One of the tasks prescribed in the ESMF is to identify the appropriate individuals/entities to be involved in the Project activities, and define their respective roles and responsibility. Details of the institutional arrangements are found in Table 7.

Table 7: Safeguard Responsibilities

ENTITY	RESPONSIBILITIES
PIU	• Compliance with World Bank Safeguards Policies and other relevant country laws in line with this ESMF • Smooth and efficient implementation of the Project • ARAP/RAP preparation; • Effective review, approval and implementation of the ESMPs based on the ESMF
Safeguards Specialist	• Assists PIU to fully comply with World Bank Safeguards Policies and other relevant country laws • Take the lead in ensuring adequate screening and scoping of Project for the appropriate safeguard instrument • Ensure adequate review of all safeguard reports (monthly and quarterly) before sending to World Bank • Supervision (and enforcement where necessary) of the contractors, supervisors, training of contractors and workers, monitoring of the implementation of the ESMF and other safeguard instruments
BRA	Various depending on which specific Ministry, Department or Agency: • Take the lead in screening, scoping, review of draft ESIA/ESMP for the government, receiving comments from stakeholders during public hearing of the Project proposals, and convening a technical decision-making panel (if required), ensuring conformity with applicable standards, conduct environmental and social liability investigations, and perform monitoring and evaluation work. • Provides overall leadership during public consultation meetings with critical Project stakeholders, in order to gain their support/cooperation/consensus in established policy direction; and • Ensures that Project implementers comply with all relevant environmental laws and policies
Engineering Supervision Agent	• Supervise Consultants hired to prepare the feasibility studies and basic engineering design of proposed subproject infrastructures; • Supervise the Consultants hired to prepare ESMP for each of the approved road and bridge subprojects, during the Detailed Design phase; • Assist in the preparation of tender documents including the inclusion of the ESMP as part of the scope of work of the bid documents; • Supervise the contractors hired to implement the road and bridge subprojects, including its ESMP.

ENTITY	RESPONSIBILITIES
	• Assist the BRA in the monitoring of Project performance including the environmental concerns (i.e. conduct of environmental assessment, procurement, and implementation of ESMP).
Independent Monitoring Agent	• Provide monitoring support of all projects in the Bank Somalia portfolio, including SURP
Consultants	• Prepare the ESMF following WB safeguards policy and Somalia environmental laws during the basic design phase; • Conduct Environmental Assessment for each road and bridge subproject following the approved ESMF during the Detailed Design phase;
Construction Contractors	• Implement the ESMP as contained in the bid documents, or propose a modified version based on the results of the contract negotiations; • Submit periodic progress report on the implementation of its approved ESMP. • Submit itself to periodic and special inspections by the Project Owner, Independent Monitoring Agent, and other oversight government agencies, and comply with instructions/ corrective measures for identified deficiencies in its ESMP implementation.
Local Government	• Appoints Local Government Desk Officers who visit communities and the project Implementers on a regular basis to facilitate stakeholder participation and compliance with local environmental laws • Support the PIU by participating in environmental and social screening and scoping process of sub-projects and public review of ESMPs
NGOs and CSOs	• Assists the Project implement effective response to relevant environmental and social issues • Conducts scientific researches alongside government groups to devise sustainable environmental strategies and rehabilitation techniques • Provides wide support helpful in management planning, institutional/governance issues and other livelihood related matter, Project impacts mitigation and monitoring

To expand upon the role of the Environmental and Social Safeguards Specialist as detailed in Table 7, this Specialist is to ensure the effective management of environmental and social concerns throughout the Project cycle from the planning, detailed design, implementation, and monitoring and evaluation. Thus, a key function of Safeguards Specialist is to ensure compliance with the World Bank's environmental and social safeguards policies as contained in this ESMF.

During the implementation of the Project, the Safeguards Specialist, will work closely with relevant organizations. This is intended to have a coordinated response on operational issues that affects the environmental and social aspects of the sub-projects. The roles and responsibilities of the Safeguards Specialist are to:

- Review all ESMPs reports/documents prepared by environmental and social consultants to ensure compliance to the World Bank Safeguard policies;
- Ensure that the Project design, specifications and budget adequately reflect the recommendations of the ESMPs;
- Co-ordinate application, follow up processing and obtain requisite clearances/approvals from the WB for the ESMPs;
- Prepare regular monthly/quarterly/semi-annual progress reports with statutory requirements;

- Develop, organise and deliver appropriate environment and social safeguards related training courses for the PIU staff, the contractors, local government/community representatives and others involved in the Project implementation;
- Review and approve the Contractor's ESMP using the ESMF as guide;
- Liaise with the Contractors on implementation of the ESMPs;
- Liaise with various Government agencies on environmental, resettlement and other regulatory matters;
- Continuously interact with relevant NGOs and community groups;
- Establish dialogue with the affected communities and ensure that the environmental and social concerns and suggestions are incorporated and implemented in the Project;
- Review the performance of the Project in terms of environmental and social safeguards through an assessment of the periodic internal monthly and quarterly environmental and social monitoring reports; provide summaries of same and initiate necessary follow-up actions; and

Provide support and assistance to the BRA/MoM and the World Bank during Project Review Missions

7.3 Capacity Building and Training

Based on the public consultation, the capacity assessment of implementing federal and state level MDAs as well as the PIU, was undertaken. The effective functioning of the MDAs is hindered by limited technical skills and resource constraints.

Thus, institutional barriers include:

- Limited knowledge of the relationship between World Bank Safeguards policies and the existing country environmental and social laws;
- Lack of enforcement of development control regulations;
- Limited knowledge on EIAs and Environmental and Social Audits during construction/rehabilitation of drainages and culverts; and
- Limited technical capacity on solid and liquid waste management.

In order to achieve the goal of the ESMF, there is a need for capacity building and strengthening of relevant competencies on environmental and social management at municipal level MDAs. It involves organisational development, the elaboration of management structures, processes and procedures, not only within organisations but also the management of relationships between the different organisations and other concerned sectors (public, private and community).

The environmental and social management requirements and provisions outlined in this ESMF, competencies and capacity building will be required in the following areas:

- Environmental Impact Assessment process - screening, scoping, impact analysis, mitigation measures and monitoring, reviewing ESIA reports;
- Environmental Due Diligence - types of due diligence, screening projects for liabilities, scoping due diligence investigations and reviewing due diligence reports; and
- Monitoring and Evaluation - understanding the importance of monitoring and evaluation (M&E) in project implementation, M&E requirements for environmental and social sustainability of projects.

While the training needs of the Municipal local government and its instrumentalities are important, however, the Project can only cover the capacity-building programs for those concerned government institutions that have direct participation in its activities as defined in the Institutional Arrangements. Specific areas for effective institutional capacity needs are given in Table 8.

Table 8: Training/Capacity Building Needs

TRAINING NEED	WHO	TRAINING METHOD	DURATION (days)	WHEN	CONDUCTED BY	AGENCY COORDINATING	COSTS[24] (using assumptions)
WB Safeguards Awareness Training on Environmental Safeguards Policies	Municipality Senior Staff	Briefings	0.5	Prior to implementation	External Specialists	PIU	2 days preparation, plus delivery, travel time, flight, hotel other logistics, workshop (hire, materials, per diem) 10,000 USD
Project Screening, Scoping Review of EIA and its integration into designs	Municipality Technical and Operational Staff	Workshop	1	Prior to implementation	External Specialists	PIU	3 days preparation, plus delivery, travel time, flight, hotel other logistics, workshop (hire, materials, per diem) 7,000 USD
Preparation and administration of questionnaires and stakeholder consultation	Municipality Technical and Operational Staff	Workshop	1	Prior to implementation	External Specialists	PIU	3 days preparation, plus delivery, travel time, flight, hotel other logistics, workshop (hire, materials, per diem) 7,000 USD
Project Management, including Management of Environmental Health and Safety Impacts of Construction (scope, implementation, time, budget, costs, resource, quality, procurement, monitoring and evaluation)	PIU	Workshop	2	Prior to implementation	External Specialists	PIU	6 days preparation, plus delivery, travel time, flight, hotel other logistics, workshop (hire, materials, per diem) 14,000 USD
Monitoring and Evaluation (a. Selection of performance indicators; b. methods of monitoring; c. evaluation of performance; d. report writing).	PIU Safeguards Unit	Workshop	4	Prior to implementation	External Specialist	PIU	6 days preparation, plus delivery, travel time, flight, hotel other logistics, workshop (hire, materials, per diem) 14,000 USD
Total							52,000 USD

[24] *In USD*

7.4 Grievance Redress Mechanism

The GRM is part of the broader process of stakeholder participation that provides a stakeholder a means to have his /her concerns amicably resolve at the earliest possible time. The mechanism takes into consideration lessons learned in other development projects implemented in the country, as well as the existing traditional practices such as the "xeer" system which is the most cost-effective and most logical form of justice for the majority of Somalis. To help ensure that the process does not marginalize women and other vulnerable groups, representation for these groups (women and other vulnerable groups) will be required in the Grievance Redress Committee (GRC) tasked to resolve grievances/complains. Additional details on the GRM are also provided in the Resettlement Policy Framework (RPF), and a sample Grievance Redress Registration Form is included in Annex 6.

The objectives of the grievance redress mechanism are:

- Provide an effective avenue* for aggrieved persons/entity to express their concerns and secure redress from issues/complaints caused by the Project; these grievances may arise from resettlement and compensation activities, or from impacts from construction activities.
- Promote a mutually constructive relationship among community members, project affected persons, government and funding institutions;
- Prevent and address community concerns;
- Assist larger processes that create positive social change; and
- Identify early and resolve issues that would lead to judicial proceedings.

**May need to consider separate mechanism for women and children (as a way to ensure their voices are heard)*

7.4.1 Grievance Management Process

Grievance resolution requires localised mechanisms that take account of the specific issues, cultural context, local customs and tradition, and Project conditions and scale. A representative Grievance Redress Flow process that could be followed:

- Receive, register and acknowledge complaint;
- Screen and establish the basis of the grievance;
- Nuisance complaints are rejected but the reason for the rejection should be clearly explained to the complainant;
- GRC to hear and resolve the complaint;
- Implement the case resolution or the unsatisfied complainant can seek redress at a formal court of justice;
- Elevation of the case to a formal court if complainant is not satisfied with the GRC resolution
- Document the experience for future reference.

Essentially, registration of complaints, acknowledgement, follow-ups, mediation and corrective actions is presented. This is further amplified in Table 9 which describes the steps in the grievance management process. Irrespective of the size and nature of the complaint, the GRM does not replace or circumvent existing traditional mechanisms for dispute resolution in the communities.

7.4.2 Grievance Redress Committee

A functional GRC will be constituted by the PIU in conjunction with the local community to monitor and review the progress of implementation of the Project. The specific composition of these committees will vary upon location and context. But generally speaking, the GRC will be comprised of Project Affected Persons (PAPs), municipal government officials, local civil society leaders and representatives of women and youth groups who will be will be formed to receive and handle any arising complaints

The main functions of the Committee are:

- Inform the affected persons about the grievance redress mechanism;
- Verify grievances and their merits;
- Recommend to the PIU solutions to such grievances;
- Communicate the decisions to the claimants;
- Ensure that all notices, forms, and other documentation required by claimants are made available in local language understood by people; and
- Ensure documentation of all received complaints and the progress of remediation.
- Provide the Bank, PIU and other oversight agencies, through the internal and external monitors a listing of cases handled and their respective status.

Table 9: Principal Steps of the Grievance Management Process

STEPS	DESCRIPTION	TIMELINE*
1	Receipt of the grievance	½ day
2	Completion of the grievance form	½ day
3	Entry of the complaint into the grievance database	½ day
4	Preliminary assessment of grievance: internal evaluation of the severity of the complaint by a Project staff knowledgeable of the process. The findings to be indicated in the accomplished complaint form.	2 days
5	• For legitimate cases, the Project staff to first meet the complainant and try to resolve the issue. The case is resolved, then recommendations will be made by the concerned Project staff on the case for implementation by the concerned project staff/office; • For nuisance cases, these shall be rejected, but the Project staff will need to explain the nature of the rejection.	5 days
6	• For legitimate concerned that cannot be resolved by the concerned Project staff, the complaint will be forwarded to the Grievance Redress Committee for resolution. • Resolution by the GRC will be returned to the concerned offices for action.	1-2 weeks
7	• If the complainant is not satisfied with the GRC's decision; he/she can elevate the case to the mediation for resolution. The decision of the committee will be returned to the Project office for action.	1-2 weeks
	• If the complainant is not satisfied with the decision of the Mediation Committee, then he/she can elevate the case to a formal court of justice for resolution. • The court's decision is final. The case will be returned to the concerned project office for action.	1-2 weeks

8	The documentation of the hearings will be made by the Project staff, and submit the same to BR RU copy furnished the Council.	2-3 weeks after registration
* If this time limit cannot be met, the PIU through the GRM advises the complainant in writing that they require additional time		

7.4.3 Mediation Committee

The Independent Mediation Committee is a structure that is to be established by the PIU to independently and impartially resolve grievances through mediation and dispute resolution. Mediation by the Committee is only to take place in case the complainant is not satisfied with the initial resolution proposed by the GRC. The Committee uses mediation to resolve disputes or complaints submitted to it. It will be composed of elder/s or their representative from the dominant clan exercising control over the area, among others.

The Committee will be independent from the PIU but has access to any information that the PIU and or its implementation partners have, regarding the complaint. The determinations of the GRC are non-binding on either party. The Committee meets as needed, depending on registered complaints and disputes, and its members receive a stipend from the PIU to cover costs of attending meetings.

If a solution that is acceptable to all parties emerges out of the meeting with the Committee, the grievance may be considered resolved and closed out; all parties are then notified. If no acceptable solution is agreed upon, either party has the option of taking legal action. The composition of the Committee shall be established based on the specific Project location and will include three people of high reputation as impartial mediators in the region such as elders, retired judges and so on.

7.5 Environmental and Social Monitoring

Monitoring is an essential part of the ESMF during Project implementation. Monitoring verifies the effectiveness of impact mitigation measures, including the extent to which mitigation measures are successfully implemented.

Monitoring will be one of the principal activities of the PIU Safeguards Specialist once an environmental permit is secured for a sub-project, contract is awarded and the project implementation commences. The PIU Safeguard Unit will commence monitoring as an important feedback mechanism.

This ensures that the environmental and social mitigation measures in this ESMF are:

- Adhered to in implementation and are informed by emerging situations:
- Identified in the planning phase (contained in the EIA report), and incorporated in the project design and costs;
- Maintained throughout the construction and operation phases through to the decommissioning of sites, facilities and equipment; and
- Where inadequate, additional remedial actions are identified (including corrective measures or re-design of mitigation measures).

Methods for monitoring the implementation and performance of mitigation measures should be as simple as possible. The choice of performance indicators should be reflective of the ESMF objectives. These should be quantifiable, monitoring sites, methods of analysis and frequency of collection should be consistent with the sub-project ESMPs. The means by which

these parameters are collected should be simple and not expensive to do so that the PIU and local governments may be able to carry out such monitoring work. Likewise, monitoring should also have its evaluation component so that the performance of contractors with regards to compliance to environmental and social mitigation would be determined, and appropriate recommendations/courses of action be provided to remedy shortfalls. For instance, they could just be regular observations of the sub-project activities or sites during construction and then when in use. Most observations of inappropriate behaviour or adverse impacts should lead to common sense solutions. In some cases, there may be need to require investigation by a technically-qualified person. Of special concern are violations committed against women and vulnerable groups within the Project area that are perpetuated by construction workers and other persons connected in the Project. Such incidents shall be brought to the attention first of the Project Management for proper disciplinary action against the perpetuators. If the case involves parties external to the Project, then the case will be referred to the proper authorities for action.

The monitoring roles and responsibilities would be carried out by the following:

- PIU Safeguard Unit is the internal monitor of the Project, and it is tasked to check the performance of the contractors in the implementation of the approved ESMP which is contained in the Scope of Works, among others;
- MDAs provide an oversight role as it relates to safeguard issues, will carry out own compliance monitoring to ensure that the permit conditions and relevant standards and mitigation measures are being fulfilled by operators in the sub-projects;
- Local Government traditionally would participate in the monitoring to ensure and verify adequacy of implementation of various measures;
- Communities as well as the CBOs/NGOs will be useful agents in primary data collection vital in monitoring ESMP implementation, as well as corrective action plan prescribed for delinquent contractors;
- An engineering supervision agent will assist the BRA in the monitoring of Project performance including the environmental concerns (i.e. conduct of environmental assessment, procurement, and implementation of ESMP);
- An independent monitoring agent will provide overall monitoring support to all Somalia projects, including SURP;
- World Bank will continually review the performance of the Project in meeting the provisions of the Loan Covenants, which include the conduct of environmental assessment using the appropriate instruments (ESIA, ESMP), securing approvals for these instruments prior to implementation, selection of qualified contractors to implement the ESMP among its Scope of Works, submission of regular environmental monitoring reports; and implementing corrective action plans prescribed by WB project review missions.

7.6 Budgets for the ESMF

To effectively implement the environmental and social management measures suggested as part of the ESMF, necessary budget need to be provided. An indicative budget had been provided in Table 10 that will cover safeguards related expenses such as capacity-building programs, coordination and public consultation meetings; planning workshops, monitoring work, environmental consultancy services. This estimated budget does not include the cost for mitigation and enhancement measures, which will be integrated into the construction cost. Likewise, all administrative costs for the operation of the PIU Safeguard Unit are including in the overall Project cost.

Table 10: Estimated Annual Budget to Implement ESMF

ESMF REQUIREMENTS	BUDGET BASIS AND ASSUMPTIONS	TOTAL COST PER ANNUM (USD)
Capacity Building for PIU Personnel and Municipality	Training programmes held in-country (all in one year)	52 000
Meetings, Workshops and Stakeholder Engagement	For 30 persons/year x two workshops	4,000
Environmental Screening of transactions	No additional budget	No additional budget
Field visits to Project locations	Field visits estimated for two PIU personnel per year (to cover, transport, and daily allowances)	Already in PIU budget
Sub-Project Scoping Workshops	One-day ESIA Scoping workshop for bridges and quarries	Budget as part of ESMP preparation (8,000)
Typical ESMP Report for sub-projects	Assume average cost of each ESMP, 25 days	Budget as part of ESMP preparation (50,000)
Typical Stakeholder Engagement for sub-project	Assume average cost of each ESMP, 10 days	Budget as part of ESMP preparation (10,000)
Engagement of Environmental and Social Specialists	Allow for five specialists, 10 days each plus expense	Budget as part of ESMP preparation (75,000)
Monitoring Compliance with ESMP during pre-operations activities	Assume quarterly monitoring activities over five days, each quarter, per year (two persons plus logistics, per diem etc)	Budget as part of ESMP preparation (30,000)
Monitoring Compliance with ESMP and during operations	Assume quarterly monitoring activities over five days, each quarter, per year (one person plus logistics, per diem etc)	Budget as part of ESMP preparation (20,000)
	TOTAL Estimated Budget	56,000
	Contingency (15%)	8,400
	Grand Total	64,400

7.7 Update and Revision of ESMF

The ESMF will be used for screening of sub-projects, a guide for the preparation, review and approval of sub-project ESMPs. Since there may be new developments, guidelines or national legislations issued after the ESMF approval and disclosures, the ESMF may need to undergo updating from time to time.

7.8 Disclosure of Safeguard Instruments

The ESMF has been prepared in consultation with the relevant stakeholders. Copies of this ESMF and other safeguard instruments (RPF) that would be prepared for the sub-projects should be disclosed in compliance with relevant country regulations and the World Bank operational policy. The ESMF will be disclosed in-country at designated sites and translated as much as possible into main local language (s). It will also be disclosed in two daily newspapers for 21 days, or as required by country laws, while the World Bank will disclose the document at its Info Shop. The information to be disclosed is listed in Table 11.

Table 11: Types of information to be disclosed

TOPIC	DOCUMENTS TO BE DISCLOSED	FREQUENCY	MEDIA
Public Consultation	Minutes of Meetings	Within two weeks	
Environment Management	ESMF	Prior to commencement of any work	World Bank External Web Site
	ESIAs/ESMPs	Prior to awarding works that the ESIA or ESMP was prepared for	
All environmental documents	A non-technical executive summary	Applicable to the document being disclosed	

ANNEX 1: ESMP TEMPLATE FOR ROAD PROJECTS

Construction of a road can result in a lasting change to the environment. Therefore, it is essential to identify and manage road development in a pro-active and responsible manner. This means taking environmental issues into consideration during planning, design, construction and operation of the road project thereby reducing negative environmental impacts while enhancing positive impacts and socio-economic benefits.

OP 4.01, Annex A defines an *Environmental Management Plan (EMP)* as *"An instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental impacts, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures."* Bank Procedure (BP) 4.01, Annex C goes further to clarify that *"A project's EMP consists of the set of mitigation, monitoring and institutional measures to be taken during the implementation and operation to eliminate adverse environmental and social impacts, offset them, or reduce them to acceptable levels. The plan [EMP] also includes actions needed to implement these measures.*

Environmental Impacts and Mitigations of Road Projects

Road construction normally include rehabilitation of existing roads which may involve widening of the road, replacement and /or strengthening of road pavement, drainage and side slope improvements, culvert and or bridge installation, relocation of services, construction of sidewalks and bus stops, installation of roadside furniture, etc. Sometimes it may also include realignment of a short stretch of the road. Construction of a new road, in a "green field" environment, is not included in road rehabilitation as it would draw a Category 'A' classification.

Construction activities and the environmental impacts associated with a road projects are summarized below. Most of these impacts result from various materials needed for construction / rehabilitation of roads and associated infrastructures and maintenance of equipment. The impacts may result from acquisition, transportation, storage and handling of such materials either from borrow pits, quarries, concrete mix plants, asphalt plants, etc.

- **Site clearance** for right-of-way and establishing Contractor's work camps, staging areas, etc. This may involve loss of vegetation including trees, loss of top soil, generation of waste material and generation of dust. The impacts can be minimized or mitigated by minimizing the areas to be cleared, salvaging crops, chipping the vegetation for use as mulch, salvaging the top soil for future use, applying dust control measures, etc.
- **Sourcing of construction materials:** This may activity often involves creation of borrow pits for earthworks materials; transport, stockpiling and use of such materials; disposal of unsuitable materials, recycle, reuse or disposal of pavement materials, etc. However for the Mogadishu subproject, no borrow pits are required and most materials, including precast concrete interlocking blocks (PCIB) which will be used for the road surface area available through local supplier.
- **Asphalt plants, stone crushers, cement mix plants** used in the manufacture of asphalt concrete or cement concrete could involve a stone crusher as part of the asphalt or concrete mix plants, although the road surface option chosen for Mogadishu involves using precast concrete paver blocks (PCIB). For large operations, the activities may involve crushing of stones using large and noisy equipment, conveyors to transport aggregates and sand, oil fired aggregate heaters

and dryers and batch mixers or it could simply involve the heating of bitumen and hand mixing. Potential environmental problems involve spills or improper handling of bitumen, surface water contamination, noise from crushers and air pollution particularly dust and smell. To a large extent all these impacts are controllable and manageable by using dust collectors and smell scrubbers.

- **Access roads** to borrow and disposal areas, construction / labour camps and other ancillary facilities may be required to facilitate access to these sites. Apart from direct impacts (dust, drainage, safety, etc.) resulting from the construction of the road, the alignment of the road could result in increased exploitation of the natural resources in the area. In some cases, the impacts can be remedied by the use of existing roads, upgraded where necessary, and avoiding protected and or sensitive areas.
- **Operation and Maintenance Phase:** While the rehabilitation of the road would lead to improved traffic flow and communications, it may also result in increased air pollution, traffic noise, and accidents. Public awareness campaign to promote safety, enforce traffic laws, upkeep / increase roadside plantation, and where appropriate construct noise barriers near sensitive locations should be undertaken.

Construction Monitoring

Environmental monitoring during project implementation provides information about key environmental aspects of the project, particularly the environmental impacts of the project and the effectiveness of mitigation measures (BP 4.01 Annex C). This can only be ascertained by monitoring key parameters of the project to ensure that the impacts are as predicted and that the mitigation measures are effective. If they are not, then the monitoring would alert the Contractors and the Client of the need to take additional actions to remedy the situation.

In compliance monitoring, it is generally not necessary or required to monitor all project impacts but only those which are pertinent to the project. This will ensure that mitigation measures are properly implemented. For example, dust and noise are major impacts of construction projects involving large scale earth moving operation, especially near schools and hospitals. Generally, monitoring should be carried out when the effects can be measured, mitigated, assist in decision making, are important to the public and are cost effective.

Dust and noise pollution is normally site and time specific. In case of dust, visual assessment can be used to trigger watering of the site generating dust. Noise can be measured by a hand-held noise meter. Discharge of sediments can be controlled by installing sediment traps. Suspended solids monitoring may be appropriate where the discharge is into a stream leading to a sensitive location. This is called impact monitoring and may be required to assess long-term impacts but requires expertise and long-term funding.

The EMP should include construction and operational monitoring plans specially where air quality or surface water quality is impacted from operational discharges to the environment.

Capacity Development and Training

To support timely and effective implementation of environmental project components and mitigation measures, BP 4.01 Annex 'C' recommends that *"EMPs cover one or more of the following additional topics: (a) technical assistance programs, (b) procurement of equipment and supplies, and (c) organizational changes."* While the procurement of equipment and

supplies (lab equipment, noise monitoring meters, etc.) is straight forward and mostly welcomed, technical assistance (TA) programs and organizational changes should be approached with caution and initiated only after comprehensive discussions with the Government. Donor consultations should also be undertaken to avoid duplication and where appropriate develop joint or supplementary assistance. At times the Clients are reluctant to spend TA money when that money is part of the World Bank loan.

The EMP should include a detailed table listing the equipment to be purchased, the cost of the equipment, and the budget for training the operators. Where TA is agreed on the EMP should provide detailed information on the TA, the scope of the TA an its outputs, the implementation schedule and the budget.

Implementation Schedule and Cost Estimates

BP 4.01 Annex 'C' states that "*For all three aspects (mitigation, monitoring and capacity development) the EMP should provide (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurring cost estimate and sources of funds for implementing the EMP. This figure should also be integrated into total project cost tables."* Depending on the project design cycle, detailed implementation schedule may not be available in which case the EMP should include as detailed an implementation schedule as available. Budget to implement the EMP should be estimated and included in the report.

Some aspects of the EMP (such as top soil stripping and stockpiling, regular watering to control dust, etc.) will be part of good engineering design and do not require supplementary budget. Others such as road side plantation, converting borrow areas into water storage ponds, etc. will require additional budget, which should be estimated and included in the cost of implementing the EMP.

Integration of EMP with Projects

According to BP 4.01 Annex 'C', the Bank's decision to support the project is "*predicated in part on the expectation that the EMP will be executed effectively. Consequently, the Bank expects the plan [EMP] to be specific in its description of the individual mitigation and monitoring measures and its assignment of institutional responsibilities, and it must be integrated into the project's overall planning, design, budget and implementation. Such implementation is achieved by establishing the EMP within the Project so that the plan will receive funding and supervision along with the other components."* True implementation can only be achieved if the EMP is part of the bid documents and even then some contractors, to remain competitive, may not adequately reflect the real cost of environmental mitigation in their bids. A better strategy is to include the mitigation measures as a "line item" in the Bill of Quantities. Thus there would be an identified extra payment in the contract to ensure that the work is carried out by the Contractor as specified.

ANNEX 2: TEMPLATE FOR IMPACT AND MITIGATION MATRIX FOR ROAD PROJECTS

Environmental Issues and Objectives	Mitigation Measures	Remarks
Design / Pre Construction Phase		
Protection of Sensitive Natural Areas • Minimize negative impacts on sensitive environment	• Identify potential environmentally sensitive areas • Avoid or locate optional construction sites/activities away from sensitive areas. • Ensure construction personnel are aware of locations of sensitive areas • Include temporary fences / barriers to restrict construction activities from encroaching sensitive area	• Inspect the alignment for unique features and environmentally sensitive areas which require design accommodation or protection • Develop replantation program using local flora and in consultation with the local communities
Road Safety and Environmentally Sound Design • To avoid accidents during and after construction of the road • To provide sound drainage	Include footpaths and pull-off bays in villages and near markets, schools, and other community facilities in design • Include occupational health and safety requirements for the construction activities in the contract documents. • Provide cross walks, speed bumps near schools, hospitals, and markets in the design • Ensure sufficient visibility along the road section and provide light and warning signs in design • Provide camber to effectively drain runoff away from road • Include cross drains at causeways, bridges, culverts, etc.	• Identify natural drainage pattern and soil percolation rates to design for rapid disposal of road runoff • Identify and include traffic calming options in design for roads passing through villages, near market places, schools, hospitals, gathering places, etc.
Cultural Heritage • To avoid damage to cultural heritage sites i.e. ceremonial sites and burial grounds	• When a cultural heritage site is identified during the construction, Contractor is to cease all work immediately and notify the relevant cultural institute	• Carry out public / community consultations prior to the start of construction and identify potential sites • Include a chance find protocol in the contract documents
Unexploded Ordinance (UXO)	• Survey of mined areas in accordance with the United Nations International Standard for Level 2 Surveys. • Nomination of a qualified EOD expert to declare sites safe, and formal recognized	• Applies to all sites where military combat is known or suspected to have taken place. • All measures to be carried out prior to construction

Environmental Issues and Objectives	Mitigation Measures	Remarks
	training for other staff involved in the work. • Implementation of approved clearance method. • A 100% sweep by mine/metal detectors and a deep magnetometer search following clearance work • Use of approved, nominated search instruments. • Provision for medical treatment and emergency evacuation. • Relocation of unexploded ordnance to an approved location under secure conditions • Clear and accurate marking and recording of all cleared areas to facilitate subsequent identification during construction.	• No construction to proceed without confirmation in writing from EOD expert that sites are safe for construction activities • Include UXO procedure in all contract documents

Environmental Issues and Objectives	Mitigation Measures	Remarks
Construction Phase		
Soil erosion, sediment and storm runoff control • Minimize the amount of sediment lost from the site • Minimize impact of storm water containing sediment and contaminated runoff water on streams and coastal areas	• Limit ground disturbance to areas of a workable size • Schedule construction to minimize areas of soil disturbance during wet seasons • Keep vegetation clearing to a minimum • Where vegetation was removed, re-vegetate all areas immediately after construction activity finishes and where the area is not to be paved after final land contouring • Reduce the time excavated drainage channels remain unsupported • Place geotextile silt traps at drainage ditches and materials stockpiles • Contain or isolate construction areas from other surface runoff. Clean and rehabilitate the area when construction is complete • Pass storm water run-off from construction areas through geotextile silt traps before discharge into culverts or drainage systems. • Prohibit discharge of sediment bearing contaminated water to streams and ocean	• Apply to all activities such as site clearance, borrow areas, quarries, construction camps, etc. where clearing is required
Management of Stockpiles and Spoil-heaps • To minimize dust and runoff	• Identify dumping / stockpile locations with local landowners • Ensure that stockpile or spoil-heap locations do not block surface runoff or natural drainage • Install proper drainage to isolate the stockpile / dumping sites • Minimize erosion and sediment runoff by covering or vegetating spoil-heaps or stockpiles especially if prolonged exposure is envisaged, • Keep maximum stockpile height at 3m to prevent windborne deposition • Place geotextile silt traps around materials stockpiles • Ensure that no stockpiles are able to release material into the sea or streams even under heavy rain or windy conditions • Stockpiles within 20m of water should be fitted with silt traps and covered to prevent windborne deposition into the waters. • Ensure that silt from silt traps do not drain into water	• Applies to all dumping areas and materials storage areas such as stone crushers, concrete batch plants, asphalt plants, topsoil storage areas, etc.
Material Management • Minimize impacts of materials delivery and	• Develop and implement materials delivery and waste disposal handling plan, to avoid / minimize materials delivery during peak traffic periods • Implement safety measures for vehicle operation and to prevent loss of load from trucks	• Applies to all materials extraction, storage and management areas

Environmental Issues and Objectives	Mitigation Measures	Remarks
waste disposal	• Implement methods to reduce dust emission from the loads • Place silt fences around materials stockpiles • All imported material to be free of organic matter, obtained from certified clean sources and/or fumigated prior to arrival in country • For imported materials, ensure adequate docking and storage facilities at point of transfer from barge • Use water sprays or covered chutes to reduce dust emission during loading and unloading of materials from barges; • Maintain materials processing plant in good working condition so as to reduce emission from the plant;	
Extraction of Materials • To ensure that extraction of materials does not cause damage to local environment	• Balance cut and fill and explore availability of suitable materials from other ongoing projects • Obtain borrow materials from designated or approved borrow areas • Restore and re vegetate borrow areas to promote natural drainage • Place silt fences around materials stockpiles • Ensure haul trucks are not over loaded and are covered • Ensure that materials are not stored below the high water mark • If possible, obtain sand, aggregates, gravel and stones from licensed operating quarry • Warn and clear people from surrounding areas before blasting • After completion of construction, restore quarry site as per quarry rehabilitation plan	• New quarry site to be confirmed by geotechnical investigations • Locate quarry away from natural / sensitive habitats • Ensure minimum groundwater impact • Prepare quarry rehabilitation plan and secure quarry operating licence
Storage and handling of fuel and lubricants • To minimize hazards relating to fuel, oil, paints etc.	• Store fuel oil and bituminous products in a dedicated, contained location away from drainage ditches. • Fuel in excess of 1,000 liters stored on site, should be stored in sealed tanks on a concrete base that is bunded to hold 110% of the tank capacity. • Install oil and water separators in all workshops • Only nominated authorized personnel to handles fuel • Develop procedures for cleaning up accidental spills. • Report any major spill immediately to Supervisor	• Applies to all workshops, depots, storage sites work sites, construction plant sites and vehicles parking areas

Environmental Issues and Objectives	Mitigation Measures	Remarks
	• Collect and dispose of all waste oil, oil and fuel filters at an approved landfill.	
Offsite and Waste Management • To prevent / minimize contamination from solid wastes, site drainage and sewage	• Contain all inert solid waste within construction sites and remove to landfill • Remove all hazardous waste, including bitumen containers • Prepare procedures for managing spills to ensure rapid containment, immediate site cleaning and appropriate disposal • Crush, and remove all nontoxic and non-hazardous inorganic solid waste to landfill • Develop a plan for handover, sale or removal of all plant, vehicles and machinery at the end of the contract, ensuring that no unserviceable items of equipment are left behind • Install onsite toilets with appropriate management arrangements for effluent and collection of sludge to prevent any release of contamination into the soil. Liaise with Local Authority for appropriate collection and disposal of sludge • Compost or use as animal feed all green or organic wastes • Reuse treated onsite drainage effluent for dust control, equipment washing, etc.	• Applies to all off-sites storage and disposal sites • Consider reuse of effluent from concrete batching plant after treatment
Air Quality / Dust • To minimize and control dust generation and emissions from asphalt plant	• Asphalt plant generation (smoke, dust, smell, etc.) to meet regulatory requirements for temporary asphalt plant • Minimize exposed soil / material stockpile surfaces to wind • Install wind breaks or fences around material stockpiles, concrete batching and asphalt plants • Spray water on exposed soil surfaces and access roads • Asphalt plant should be equipped with either baghouse or wet scrubber particulate removing system	• Where possible, use existing, operating, licensed asphalt plant • New asphalt batching plant should be located 300-500m downwind of any settlements or inhabited areas and 150m away from any water bodies, streams or rivers
Noise • To ensure that nuisance from	• Use modern and well maintained equipment with mufflers where appropriate • Schedule noisy construction activities during normal working hours	• Establish clear construction work policies to ensure that

Environmental Issues and Objectives	Mitigation Measures	Remarks
noise minimized	• Use noise barriers / screens or mounds to shield sensitive locations • Advise local residents and authorities of any unusual or unavoidable noise activities	sensitive receptors such as schools, hospitals, religious establishment are least inconvenienced • Avoid noisy work from 6pm to 6am and during weekends and public holidays
Health & Safety • To ensure maximum safety of construction personnel and local residents	• Ensure all occupational health and safety requirements are in place on construction sites and in work camps • Install lights and cautionary signs in hazardous areas • Establish footpaths and pull-off bays along roads through villages, near markets, schools and other community facilities • Limit construction activities from 0700 hr to 1900 hr to limit exposure to dust, noise etc. • Enhance safety and inspection procedures • Ensure use of Personal Protection Equipment (PPE)	• Applies to all construction sites
Health and Safety • Awareness for construction workers:	• Prepare a site safety plan specifying responsibilities and authorities within the Contractor's staff for: ➢ adherence to safety and health requirements, ➢ adherence to occupational health and safety requirements, ➢ use of personal protective equipment, ➢ lighting and warning signs at hazardous areas, ➢ setting rules for operation of vehicles and equipment by authorized personnel, ➢ setting procedures for safe handling of toxic and hazardous materials, ➢ arrangements for first aid and emergency procedures, ➢ posting notices about medical assistance and location of emergency equipment, ➢ setting schedules for regular checking of adherence to the plan and ➢ training staff to familiarize them with the plan, their obligations to implement it, and main areas of risk to workers and others • Provide for the management and control of traffic during the works, arrangement for safe delivery of construction materials and safe parking of vehicles and plant (both during and after working hours)	

Environmental Issues and Objectives	Mitigation Measures	Remarks
	• Education on basic hygiene practices to minimize spread of tropical diseases • Increase workers' HIV/AIDS and STD awareness, including information on methods of transmission and protection measures • Prohibit usage of drugs and alcohol on construction sites	
Disruption of Utilities	• Maintain high standards of site supervision and vehicle and plant operation to reduce risks of damage to water, power and telecommunication lines • Prepare procedures for rapid notification to the responsible Authority • Provide assistance with re-instatement, in the event of any disruption	• Applies to all construction sites
Site rehabilitation • To minimize ongoing impacts after construction is completed:	• Excavate any contaminated soil from fuel depots / workshops, remove and reshape the area. • Rake or loosen all compacted ground surfaces • Ensure that waste and surplus materials are removed from site • Contour sites to conform to the surrounding landscape and natural drainage. • Apply topsoil and re vegetate the site using local flora	• Applies to all disturbed areas and construction sites
Operation Phase		
Safety & Maintenance Practices • To enhance safety and maintenance practices	• Implement traffic calming procedures at selected places such as schools, markets, etc. • Promote use of off-road stops • Enhance improvements in road signage and pavement markings. • Analyse road accident black spots and implement remedies • Conduct regular monitoring and inventory of risks for erosion and drainage problems • Conduct routine maintenance like grading, grass cutting, drain clearing, pothole patching, and shoulder repairs, etc.	• Applies to the entire road

ANNEX 3: ENVIRONMENTAL MANAGEMENT CONTRACTOR CONDITIONS

In addition to these general conditions, the Contractor shall comply with any specific Environmental and Social Management Plan (ESMP) for the works that s/he is responsible for. The Contractor shall inform her/himself about such an ESMP, and prepare her/his work strategy and plan to fully take into account relevant provisions of that ESMP. If the Contractor fails to implement the approved ESMP after written instruction by the Supervising Engineer (SE) to fulfil her/his obligation within the requested time, the Client reserves the right to arrange through the SE for execution of the missing action by a third party, to account of the Contractor.

Notwithstanding the Contractor's obligation under the above clause, the Contractor shall implement all measures necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore work sites to acceptable standards, and abide by any environmental and/or social performance requirements specified in the ESMP.

In general, these measures shall include but not be limited to:

- Minimize the effect of dust on the surrounding environment resulting from earth mixing sites, asphalt mixing sites, dispersing coal ashes, vibrating equipment, temporary access infrastructure such as roads, etc. to ensure safety, health and the protection of workers and communities living in the vicinity dust producing activities;
- Ensure that noise levels emanating from machinery, vehicles and noisy construction activities (e.g. excavation, blasting) are kept at a minimum for the safety, health and protection of workers within the vicinity of high noise levels and nearby communities;
- Ensure that existing water flow regimes in rivers, streams and other natural or irrigation channels are maintained and/or re-established where they are disrupted due to works being carried out;
- Prevent bitumen, oils, lubricants and waste water used or produced during the execution of works from entering into rivers, streams, irrigation channels and other natural water bodies/reservoirs, and also ensure that stagnant water in uncovered borrow pits is treated in the best way to avoid creating possible breeding grounds for mosquitoes or other disease vectors;
- Prevent and minimise the impacts of quarrying, earth borrowing, piling and building of temporary construction camps and access infrastructure such as roads on the biophysical environment including protected areas and arable lands; local communities and their settlements. In as much as possible restore/rehabilitate all sites to acceptable standards;
- Upon discovery of ancient heritage, relics or anything that might be, or believed to be, of archaeological or historical importance during the execution of works, immediately report such findings to the SE so that the appropriate authorities may be expeditiously contacted for fulfilment of the measures aimed at protecting such historical or archaeological resources;
- Discourage construction workers from engaging in the exploitation of natural resources such as hunting, fishing, collection of forest products or any other activity that might have a negative impact on the social and economic welfare of the local communities;
- Implement soil erosion control measures in order to avoid surface run off and prevents siltation, etc.;

- Ensure that garbage, sanitation and drinking water facilities are provided in construction workers camps;
- Ensure that, in as much as possible, local materials are used to avoid importing foreign material and long distance transportation; and
- Ensure public safety, and meet traffic safety requirements for the operation of work to avoid accidents.

The Contractor shall indicate the period within which s/he shall maintain status on site after completion of civil works to ensure that significant adverse impacts arising from such works have been appropriately addressed.

The Contractor shall adhere to the proposed activity implementation schedule and the monitoring plan / strategy to ensure effective feedback of monitoring information to project management so that impact management can be implemented properly, and if necessary, adapt to changing and unforeseen conditions.

Besides the regular inspection of the sites by the SE for adherence to the contract conditions and specifications, the Client may appoint an Inspector to oversee the compliance with these environmental and social conditions and any proposed mitigation measures. State environmental authorities may carry out similar inspection duties. In all cases, as directed by the SE, the Contractor shall comply with directives from such inspectors to implement measures required to ensure the adequacy rehabilitation measures carried out on the bio-physical environment and compensation for socio-economic disruption resulting from implementation of any works.

Worksite/Campsite Waste Management

All vessels (drums, containers, bags, etc.) containing oil/fuel/surfacing materials and other hazardous chemicals shall be bundled in order to contain spillage. All waste containers, litter and any other waste generated during the construction shall be collected and disposed of at designated disposal sites in line with applicable government waste management regulations.
All drainage and effluent from storage areas, workshops and camp sites shall be captured and treated before being discharged into the drainage system in line with applicable government water pollution control regulations.

Used oil from maintenance shall be collected and disposed of appropriately at designated sites or be re-used or sold for re-use locally.

Entry of runoff to the site shall be restricted by constructing diversion channels or holding structures such as banks, drains, dams, etc. to reduce the potential of soil erosion and water pollution. Construction waste shall not be left in stockpiles along the infrastructure such as road, but removed and reused or disposed of on a daily basis.

If disposal sites for clean spoil are necessary, they shall be located in areas, approved by the SE, of low land use value and where they will not result in material being easily washed into drainage channels. Whenever possible, spoil materials should be placed in low-lying areas and should be compacted and planted with species indigenous to the locality.

Material Excavation and Deposit

The Contractor shall obtain appropriate licences/permits from relevant authorities to operate quarries or borrow areas. The location of quarries and borrow areas shall be subject to approval

by relevant local and national authorities, including traditional authorities if the land on which the quarry or borrow areas fall on traditional land.

New extraction sites:

- Shall not be located in the vicinity of settlement areas, cultural sites, wetlands or any other valued ecosystem component, or on high or steep ground or in areas of high scenic value, and shall not be located less than 1 km from such areas;
- Shall not be located adjacent to stream channels wherever possible to avoid siltation of river channels. Where they are located near water sources, borrow pits and perimeter drains shall surround quarry sites;
- Shall not be located in archaeological areas. Excavations in the vicinity of such areas shall proceed with great care and shall be done in the presence of government authorities having a mandate for their protection;
- Shall not be located in forest reserves. However, where there are no other alternatives, permission shall be obtained from the appropriate authorities and an environmental impact study shall be conducted;
- Shall be easily rehabilitated. Areas with minimal vegetation cover such as flat and bare ground, or areas covered with grass only or covered with shrubs less than 1.5 m in height, are preferred; and
- Shall have clearly demarcated and marked boundaries to minimise vegetation clearing.

Vegetation clearing shall be restricted to the area required for safe operation of construction work and shall not be done more than two months in advance of operations. Stockpile areas shall be located in areas where trees can act as buffers to prevent dust pollution. Perimeter drains shall be built around stockpile areas. Sediment and other pollutant traps shall be located at drainage exits from workings.

The Contractor shall deposit any excess material in accordance with the principles of the general conditions, and any applicable ESMP, in areas approved by local authorities and/or the Supervisory Engineer (SE). Areas for depositing hazardous materials such as contaminated liquid and solid materials shall be approved by the SE and appropriate local and/or national authorities before the commencement of work. Use of existing, approved sites shall be preferred over the establishment of new sites.

Rehabilitation and Soil Erosion Prevention

As far as possible, the Contractor shall rehabilitate the site progressively so that the rate of rehabilitation is similar to the rate of construction. Always remove and retain topsoil for subsequent rehabilitation. Soils shall not be stripped when they are wet as this can lead to soil compaction and loss of structure.

Topsoil shall not be stored in large heaps. Low mounds of no more than 1 to 2 m high are recommended. Re-vegetate stockpiles to protect the soil from erosion, discourage weeds and maintain an active population of beneficial soil microbes.

Locate stockpiles where they will not be disturbed by future construction activities. To the extent practicable, reinstate natural drainage patterns where they have been altered or impaired. Remove toxic materials and dispose of them in designated sites. Backfill excavated areas with soils or overburden that is free of foreign material that could pollute groundwater and soil.

Identify potentially toxic overburden and screen with suitable material to prevent mobilisation of toxins. Ensure reshaped land is formed so as to be inherently stable, adequately drained and suitable for the desired long-term land use, and allow natural regeneration of vegetation.

Minimise the long-term visual impact by creating landforms that are compatible with the adjacent landscape. Minimise erosion by wind and water both during and after the process of reinstatement.

Compacted surfaces shall be deep ripped to relieve compaction unless subsurface conditions dictate otherwise. Revegetate with plant species that will control erosion, provide vegetative diversity and, through succession, contribute to a resilient ecosystem. The choice of plant species for rehabilitation shall be done in consultation with local research institutions, forest department and the local people.

Water Resources Management

The Contractor shall at all costs avoid conflicting with water demands of local communities. Abstraction of both surface and underground water shall only be done with the consultation of the local community and after obtaining a permit from the relevant Water Authority. Abstraction of water from wetlands shall be avoided. Where necessary, permission has to be obtained from relevant authorities.

Temporary damming of streams and rivers shall be done in such a way avoids disrupting water supplies to communities downstream, and maintains the ecological balance of the river system. No construction water containing spoils or site effluent, especially cement and oil, shall be allowed to flow into natural water drainage courses. Wash water from washing out of equipment shall not be discharged into water courses or infrastructure such as road drains. Site spoils and temporary stockpiles shall be located away from the drainage system, and surface run off shall be directed away from stockpiles to prevent erosion.

Traffic Management

Location of access infrastructure such as roads/detours shall be done in consultation with the local community especially in important or sensitive environments. Access infrastructure such as roads shall not traverse wetland areas. Upon the completion of civil works, all access infrastructure such as roads shall be ripped and rehabilitated. Access infrastructure such as roads shall be sprinkled with water at least five times a day in settled areas, and three times in unsettled areas, to suppress dust emissions.

Blasting

Blasting activities shall not take place less than 2 km from settlement areas, cultural sites, or wetlands without the permission of the SE.

Blasting activities shall be done during working hours, and local communities shall be consulted on the proposed blasting times.

Noise levels reaching the communities from blasting activities shall not exceed 90 decibels.

Disposal of Unusable Elements

Unusable materials and construction elements such as electro-mechanical equipment, pipes, accessories and demolished structures will be disposed of in a manner approved by the SE. The Contractor has to agree with the SE which elements are to be surrendered to the Client's

premises, which will be recycled or reused, and which will be disposed of at approved landfill sites.

As far as possible, abandoned pipelines shall remain in place. Where for any reason no alternative alignment for the new pipeline is possible, the old pipes shall be safely removed and stored at a safe place to be agreed upon with the SE and the local authorities concerned. Complete pipes as well as broken parts thereof have to be treated as hazardous material and disposed of as specified above.

Unsuitable and demolished elements shall be dismantled to a size fitting on ordinary trucks for transport.

Health and Safety
In advance of the construction work, the Contractor shall mount an awareness and hygiene campaign. Workers and local residents shall be sensitised on health risks particularly of AIDS. Adequate infrastructure such as road signs to warn pedestrians and motorists of construction activities, diversions, etc. shall be provided at appropriate points.

Construction vehicles shall not exceed maximum speed limit of 40 km per hour.

Repair of Private Property
Should the Contractor, deliberately or accidentally, damage private property, he shall repair the property to the owner's satisfaction and at his own cost. For each repair, the Contractor shall obtain from the owner a certificate that the damage has been made good satisfactorily in order to indemnify the Client from subsequent claims.

In cases where compensation for inconveniences, damage of crops etc. are claimed by the owner, the Client has to be informed by the Contractor through the SE. This compensation is in general settled under the responsibility of the Client before signing the Contract. In unforeseeable cases, the respective administrative entities of the Client will take care of compensation.

Contractor's Environment, Health and Safety Management Plan (EHSMP)
Within six weeks of signing the Contract, the Contractor shall prepare an EHSMP to ensure the adequate management of the health, safety, environmental and social aspects of the works, including implementation of the requirements of these general conditions and any specific requirements of an ESMP for the works.

The Contractor's EHSMP will serve two main purposes:

- For internal purposes, to ensure that all measures are in place for adequate EHS management, and as an operational manual for contractor staff; and
- For the Client, supported where necessary by a SE, to ensure that the Contractor is fully prepared for the adequate management of the EHS aspects of the project, and as a basis for monitoring of the Contractor's EHS performance.

The Contractor's EHSMP shall provide as a minimum:

- A description of procedures and methods for complying with these general environmental management conditions, and any specific conditions specified in the ESMP;

- A description of specific mitigation measures that will be implemented in order to minimise adverse impacts;
- A description of all planned monitoring activities (e.g. sediment discharges from borrow areas) and the subsequent reporting; and
- The internal organisational, management and reporting mechanisms put in place for such.

The Contractor's EHSMP will be reviewed and approved by the Client before start of the works. This review should demonstrate if the Contractor's EHSMP covers all of the identified impacts, and has defined appropriate measures to counteract any potential impacts.

EHS Reporting

The Contractor shall prepare bi-weekly progress reports to the SE on compliance with these general conditions, the project ESMP if any, and the contractor's own EHSMP. An example format for a Contractor EHS report is provided below.

It is expected that the Contractor's reports will include information on:

- EHS management actions/measures taken, including approvals sought from local or national authorities;
- Problems encountered in relation to EHS aspects (incidents, including delays, cost consequences, etc. as a consequence);
- Lack of compliance with contract requirements on the part of the Contractor;
- Changes of assumptions, conditions, measures, designs and actual works in relation to EHS aspects; and
- Observations, concerns raised and/or decisions taken with regard to EHS management during site meetings.

It is advisable that reporting of significant EHS incidents be done immediately. Such incident reporting shall therefore be done individually. Also, it is advisable that the Contractor keep her/his own records on health, safety and welfare of persons, and damage to property. It is advisable to include such records, as well as copies of incident reports, as Annexes to the bi-weekly reports.

A sample format for an incident notification is shown below. Details of EHS performance will be reported to the Client through the SE's reports to the Client.

Training of Contractor's Personnel

The Contractor shall provide sufficient training to his own personnel to ensure that they are all aware of the relevant aspects of these general conditions, any project ESMP, and his own EHSMP, and are able to fulfil their expected roles and functions. Specific training should be provided to those employees that have particular responsibilities associated with the implementation of the EHSMP.

General topics should include:

- EHS in general (working procedures);
- Emergency procedures; and
- Social and cultural aspects (awareness raising on social issues).

Cost of Compliance

It is expected that compliance with these conditions is already part of standard good workmanship and state of art as generally required under this Contract. The item "Compliance with Environmental and Social Management Conditions" in the Bill of Quantities covers this cost. No other payments will be made to the Contractor for compliance with any request to avoid and/or mitigate an avoidable EHS impact.

EXAMPLE FORMAT: ENVIRONMENTAL, HEALTH AND SAFETY (EHS) REPORT

Contract: **Period of Reporting:**

EHS Management Actions/Measures:
Summarise EHS management actions/measures taken during period of reporting, including planning and management activities (e.g. risk and impact assessments), EHS training, specific design and work measures taken, etc.

EHS Incidents:
Report on any problems encountered in relation to EHS aspects, including its consequences (delays, costs) and corrective measures taken. Include relevant incident reports.

EHS Compliance:
Report on compliance with Contract EHS conditions, including any cases of non-compliance.

Changes:
Report on any changes of assumptions, conditions, measures, designs and actual works in relation to EHS aspects.

Concerns and Observations:
Report on any observations, concerns raised and/or decisions taken with regard to EHS management during site meetings and visits.

Signature (Name, Title Date):
Contractor Representative

EHS INCIDENT NOTIFICATION Provide within 24 hrs to the Supervising Engineer

Originators Reference No:

Date and Time of Incident:

Location of Incident:

Name of Person(s) involved:

Employing Company:

Type of Incident:

Description of Incident: Where, when, what, how, who, operation in progress at the time (only factual)

Immediate Action: Immediate remedial action and actions taken to prevent reoccurrence or escalation

Signature (Name, Title, Date):
Contractor Representative

ANNEX 4: PROTECTION OF CULTURAL PROPERTY

Cultural property includes monuments, structures, works of art, or sites of significance points of view, and are defined as sites and structures having archaeological, historical, architectural, or religious significance, and natural sites with cultural values. This includes cemeteries, graveyards and graves.

The initial phase of the proposed emergency reconstruction operations pose limited risks of damaging cultural property since projects will largely consist of small investments in community infrastructure, reconstruction of existing structures, and minor public works. Nevertheless, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents.

Chance Find Procedures

Chance find procedures will be used as follows:

- Stop the construction activities in the area of the chance find;
- Delineate the discovered site or area;
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums take over; and
- Notify the supervisory Engineer who in turn will notify the responsible local authorities and the
  Ministry of Culture immediately (within 24 hours or less);

Responsible local authorities and the Ministry in charge of Department of Archaeology and Museums would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the Department of Archaeology and Museums (within 72 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values.

Decisions on how to handle the finding shall be taken by the responsible authorities and the Ministry in charge of Department of Archaeology and Museums. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage.

Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Ministry in charge of Department of Archaeology and Museums.

Construction work could resume only after permission is given from the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums concerning safeguard of the heritage.

These procedures must be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer shall monitor the above regulations relating to the treatment of any chance find encountered are observed.

Relevant findings will be recorded in World Bank Project Supervision Reports and Implementation Completion Reports will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

ANNEX 5: GENDER MAINSTREAMING AND VULNERABILITY ASSESSMENT

Indicative Framework for Assessing and Mainstreaming Gender Concern

Gender issues are not only a part of a national discourse but they also should be integrated into policies and development programs. To this end and as part of project preparation, gender-specific consultations with communities should be conducted to assess the challenges and opportunities for the mainstreaming of gender concerns in the project

Objectives:

- Ascertain how to promote women's participation in the project and in particular activities;
- Determine under what conditions women could participate in the community-based activities;
- Determine under what conditions boys and girls could participate in the community-based activities;
- Determine under what conditions marginalized clans could participate in the community-based activities;
- Determine under what conditions displaced populations could participate in the community-based activities; and
- Determine potential negative impacts and potential mitigation measures.

Focus/Scope of the Study

In particular, the study should provide information on:

- Women's needs: aims to assess women's transport needs and identify ways to address such needs, including during sub-project selection;

- Women's voice in community consultation: aims to identify mechanisms to ensure women's preferences are reflected in community consultations, whether for consultations on social safeguards or sub-project selection;

- Women's participation in community-based maintenance: aims to identify context-specific entry points and mechanisms (e.g. quotas) for women's participation in the maintenance of rehabilitated infrastructure such as roads;

- Voice of the youth, marginalised clans and displaced populations to ensure preferences are reflected in community consultations, whether for consultations on social safeguards or sub-project selection or participation in sub-projects;

- Project impact on women's livelihoods and youth: recommend indicators or give indications on sex-disaggregation of existing indicators to reflect the project direct and indirect impact on livelihoods, and on marginalized clans and displaced populations; and

- Identify any potential security considerations or challenges that might impact women, youth, displaced populations or other vulnerable groups.

ANNEX 6: GRIEVANCE REGISTRATION FORM

COMPLAINANT DETAILS			
Complainant's name (or name of a representative for complainant/s)			
Complainant's address			
Complainant's telephone number and e-mail address (if available)			
Preferred language of communication			
Complainant confidentiality	I wish to raise my grievance anonymously		
	I request that my identity is not disclosed to anyone internally except the grievance coordinator handling my case		
I would prefer if the person contacting me is:	male	female	gender does not matter
GRIEVANCE DETAILS			
Date			
Description of incident			
Severity	One time incident/grievance (date)		
	Recurring (how many times)		
	Ongoing (currently experiencing problem)		
Complainant's request/proposal to resolve grievance (Please explain what should be done to solve this problem)			
Grievance type (environment, human rights, livelihood, health, legal, property, corruption)			
Level of damage?	low	medium	high
Additional documentation related to grievance			
Verbal Complaint	If complainant is verbal and in the case that the compliant cannot read or write, the grievance coordinator will help to write it down.		

ANNEX 7: DETAILS OF PUBLIC CONSULTATIONS

Public Consultation at Mogadishu

The workshop was held at Chelsea Village, Mogadishu and began with registration at 10:45 for a half day, 4 March 2017 and concluded by 13:00 in accordance with the agenda below:

TIME	ACTIVITY
10:00-10:45	**Tea Break**
10:45-11:00	Prayers and Registration
	Address by World Bank representative *(No representative)*
11:00-10:05	Address by UNOPS representative
11:05-11:10	Address by IPE Global Consultant (Mr Mohamed Bashir Maalim)
11:10-11:05	HE the Mayor *(Represented by the Director of Fire Department)*
11:05-11:45	Purpose and application of an ESMF (Mr Mohamed Bashir Maalim)
11:45-12:50	Applying the ESMF to urban roads (Mr Mohamed Bashir Maalim) Questions, answers and suggestions by participants
12:50-13:00	Concluding remarks by UNOPS representative
13:00	Programme over and depart

A total of 19 persons (of whom seven were women) signed in and attended (see list below). In the absence of the World Bank representative, introductory remarks were made by UNOPS, by the PIU of the Municipality, by IPE Global and HE the Mayor, followed by self-introduction of persons. IPE explained the purpose of the meeting and a presentation of the ESMF was made.

After the presentation, participants were invited to engage and discuss any part of the Project and the ESMF, noting that this would inform the final version.
To facilitate this, several initial questions were posed.

QUESTION	RESPONSE
What is the perception of the community about the Project?	*We are happy with the project*
Do you all understand the Project concept and benefit?	*Yes*
Has there been conflicts relating to the land where Project?	*No*
Who owns part or all of the land for the Project?	*Government of Somalia*
How do people acquire land?	*Inheritance and buying*
Are there local mechanism s for settling land disputes?	*Yes, through community elders and the courts*
Do individuals own or inherit land in your community?	*Yes*

QUESTION	RESPONSE
Do women in your community have access to land? If no, why not. How do women gain access to land?	*Yes*
Do women participate in community discussion and decision making? If not, why or why not.	*Somehow, yes*
How much is a plot of land?	*Land price depends on the area one is buying the land*
What is the population of the Project-affected community?	*2.5 million*
What are the key means of livelihood in this community?	*Business (small and large businesses)*
Would compensation be given for the economic crops demolished and those soon to be demolished?	*Yes by the Government*
Means of transportation/movement?	*Public and private vehicles*
What are the forms of cooperative societies in the locality?	*Various kinds of business cooperative societies*
Are there herdsmen?	*No*
In what way do the herders rear their cattle to avoid destruction of public crops and assets?	*Not applicable*
How can the activities encroachment on land be avoided or controlled?	*Government and Municipality control*
Has there been youth migration?	*Yes in search for economic gain*
Expectation from the Project?	*Job creation, High expectation*
Commitment of the community to Project implementation	*Highly supportive of the project*

Other Issues Raised

During discussions, the following issues were raised:

- Incorporate fire hydrant system into the roads design since the Municipal has the engines and fire equipment including 16 hydrants in Mogadishu;
- Before the roads are constructed, is there any way underground power lines systems can be incorporated to reduce the overhead power lines that contribute to accidents especially during the rainy seasons;
- Tree planting along the rods should be considered to reduce sand mobility since there is saltation over time;
- The roads design should take into account mobility issues for crossing the road easily, and should have a pedestrian walkway;

- At school and trading centres along the roads, there must be provision for reducing speeding;
- Special attention should be given to drainage that is crossing the roads;
- Public consultation could have been made more broad to include different community members along the designated roads;
- There were concerns that the construction of the roads could negatively impact on drainage;
- Need for disabled access;
- Road design to include bus stop or similar facility to minimize traffic obstruction;
- Currently there are places where children use on the roads as playgrounds;
- Possibilities of finding alternative play areas should be considered;
- Defects in roads act as traffic calming measures, upon construction there might be a need to include traffic calming measures such as speed bumps;
- Aesthetics, including planting of trees and flowers;
- Include road signs;
- Questionnaires targeting the community should be written in Somali;
- Provision should be made for future utility installations (water and electricity, currently being installed haphazardly);
- Need to consider possibility of installing fire hydrants;
- Ensure solar street lights installation; and
- Create community awareness on ESMF.

Conclusions

There was excellent participation by all the delegates, representing a good cross-section of stakeholders including from the communities, religious leaders, agencies, university, NGOs and various Municipality entities.

The Project was welcomed and all parties were eager to see full implementation with all safeguards as soon as possible. UNOPS was very complimentary about the clarity of the presentation and the Municipality PIU participated fully.

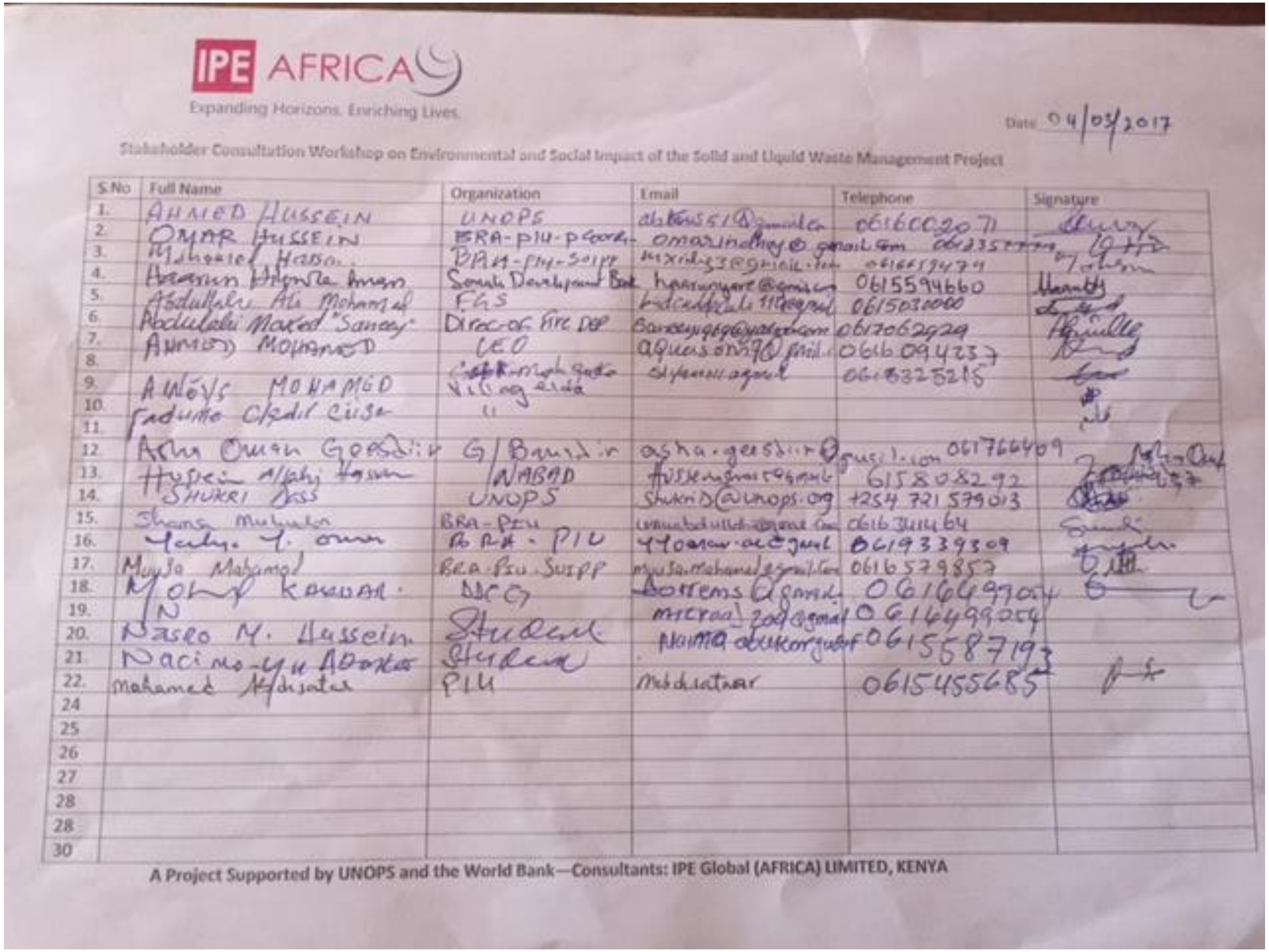
Participants

The following signed in:

	NAME	ORGANISATION	FUNCTION
1	Ahmed Hussein	UNOPS	Mogadishu-based
2	Omar Hussein	BRA PIU	Programme Coordinator
3	Mohamed Hassan	BRA - PIU Suipp	
4	Harun Hillow Iman	Somali Development Bank	
5	Abdullahi Ali Mohamed	FGS	
6	Abdullahi Max'ed "Saney"	Fire Department	Director
7	Ahmed Mohamed	AquaSom environmental and water	
8	Aweys Mohamed	Village Elder	
9	Faduma Cabdikadir Ciise	Village Elder Banadir	
10	Asha Omar Geesdiir	Banadir Women Group	
11	Hussein Abdullahi Hassan	Nabad Community Group	NABAD
12	Shukri Dass	UNOPS	

	NAME	ORGANISATION	FUNCTION
13	Shamsa Muhudin	BRA-PIU	
14	Yahya Y. Osman	BRA – PIU	
15	Muusa Mohamed	BRA-PIU SUIPP	
16	Mohamed Khadar	Deg Deg Environmental	
17	Nasro M. Hussein	Student	
18	Nacimo-yuAbukar	Student	
19	Mohamed Abdisitar	PIU	

Signed Attendance



IPE AFRICA

Expanding Horizons. Enriching Lives.

Date: 04/03/2017

Stakeholder Consultation Workshop on Environmental and Social Impact of the Solid and Liquid Waste Management Project

S.No	Full Name	Organization	Email	Telephone	Signature
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