

**GAROWE MUNICIPALITY**

**PUNTLAND STATE OF SOMALIA**

**SOMALIA URBAN RESILIENCE PROJECT (P163857)**

**Abbreviated Resettlement Action Plan**



*Photo: Aerial view of some parts of Garowe City,  
Mukhtar Nuur  
March, 2018*

**FINAL REPORT**

**FEBRUARY 2019**

**ACRONYMS AND DEFINITIONS**

ARAP	Abbreviated Resettlement Action Plan
CERC	Contingency Emergency Response Component
DDF	District Development Framework
ESMF	Environmental Social Management Framework
GM	Garowe Municipality
GRM	Grievance Redress Mechanism
IDPs	Internally Displaced Peoples
PAD	Project Appraisal Document
PAHHs	Project Affected Households
PAP	Project Affected Persons
PIM	Project Implementation Manual
PIU	Project Implementation Unit
RPF	Resettlement Policy Framework
SUIPP	Somali Urban Investment Planning Project
SURP	Somalia Urban Resilience Project
WB	World Bank

**DEFINITIONS OF TERMS USED IN THIS DOCUMENT**

<b>Project in Brief</b>	<b>Definitions</b>
Abbreviated Resettlement Action Plan (ARAP) or “Resettlement Plan”	It is a resettlement instrument (document) prepared when projects locations are identified. In such cases, land acquisition leads to physical displacement of persons, and/or loss of shelter, and/or loss of livelihoods and/or loss, denial or restriction of access to economic resources. RAP is prepared by the party (Potential Developer) impacting on the people and their livelihoods. RAP contains specific and legal binding requirements to resettle and compensate the affected party before implementation of the project activities. RAP is a site specific report for the current known impacts and is prepared in conformity with the provisions of this RPF with the views of the PAPs.
Census	A field survey carried out to identify and determine the number of Project Affected Persons (PAP) or Displaced Persons (DPs). The meaning of the word shall also embrace the criteria for eligibility for compensation, resettlement and other measures emanating from consultations with affected communities.
Compensation	Compensation is the payment in kind, cash or other assistances given in exchange for the acquisition of land including fixed assets, as well as other impacts resulting from project activities.
Project Affected Person (s) (PAPs)	PAPs are persons affected by land use or acquisition needs of the RAP in the framework of the project. These person(s) are affected because they may lose, be denied, or be restricted access to economic assets; lose shelter, income sources, or means of livelihood. These persons are affected whether or not they must move to another location.
The Resettlement Policy Framework (RPF)	It is an instrument to be used throughout the implementation of project activities as guidance tool. The RPF sets out the resettlement and compensation policy, organizational arrangements and design criteria to be applied to meet the needs of the people who may be affected by the project.
Vulnerable group	People who by their mental or physical disadvantage will be economically worse impacted by project activities than others. They include; female headed households, persons with disability, at-risk children, persons with HIV-AIDS and elderly household heads of 60 years and above.

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## **EXECUTIVE SUMMARY**

This document is the Abbreviated Resettlement Action Plan (ARAP) prepared by the Environmental and Social Safeguard Specialist of Garowe Project Implementation Unit (PIU) on behalf of the Garowe Municipality (GM) as part of the processes for preparation of a funding proposal, the ‘Somalia Urban Resilience Project (SURP), for the development of urban infrastructure in the City of Garowe.

Survey of the proposed subprojects in Garowe city identified that structures and boundary walls of 14 households with 98 PAPs will be partially affected or damaged to give way for the implementation of the respective proposed subprojects roads. The sub projects will not result in physical displacement of the PAPs. This ARAP is developed based on the Resettlement Policy Framework (RPF) that also takes into account the Puntland Law that allows for expropriation of land for public interest and also requires that GM diligently values the affected property, and duly compensates and facilitates the resettlement process of the Project Affected Persons (PAPs). Furthermore, according to RPF (World Bank Operational Policy on Involuntary Resettlement OP4.12), GM has to follow up the PAPs and support their livelihoods. The ARAP is prepared to guide the process of acquisition of property, valuation and compensation for the property, and in the monitoring of the PAPs to ensure that their livelihoods are in better conditions.

The main elements of the ARAP for Garowe city are: public consultation and engagement with affected persons, census of PAPs, inventory and documentation of assets of the PAPs, determination of compensation, setting up grievance committee and addressing grievances, monitoring and reporting of the compensation. Grievance Redress Mechanism (GRM) has been established in accordance to the RPF, Puntland Law and WB OP 4.12 guidelines. GM has agreed to provide monetary compensation for property owners to rehabilitate their structures. More so, the Municipality will support two female PAPs who are vulnerable and at the same time have shops as a source of income which is located at Gen. Nur Salad road. During the construction of Gen. Nur Salad road, the Municipality will provide disturbance allowance for these shop keepers. The total budget estimate of the ARAP implementation for Garowe City is US\$26,831.90.

## **1. INTRODUCTION**

### **1.1 Project description**

The Somalia Urban Resilience Project (SURP) is a municipal infrastructure and governance development project aimed at improving people's access to socio-economic infrastructure and strengthening municipal governance in Somalia. SURP builds on the preparation work carried out under World Bank's ongoing Somalia Urban Investment Planning Project (SUIPP). SUIPP financed institutional assessments, feasibility studies and engineering design work for urban investments in Mogadishu, Hargeisa and Garowe municipalities; institutional assessment of Hargeisa Water Agency and the Ministry of Public Works at the federal level; and helped to set up Project Implementation Units (PIUs) and build fiduciary, safeguards, project management, and monitoring and evaluation capacity of the PIU staff based at these municipalities.

The SUIPP carried out feasibility studies and preliminary engineering designs for; 30 km of 19 secondary roads and 2 bridges in Garowe however due to funding constraints, only 4 out of the 19 roads will be constructed under SURP. This ARAP is prepared for the 4 secondary roads in Garowe city.

The objectives of the Project are to strengthen public service delivery capacity at the sub-national level and support the reconstruction of key urban infrastructure in targeted areas. With regard to Garowe, the SURP will:

- (i) Support the rehabilitation of urban roads in Garowe;
- (ii) Provide capacity building support to Garowe Municipality and strengthening government systems at the sub-national level by channeling funds on-budget;
- (iii) Generate short-term income generation opportunities and improving connectivity for the urban poor, IDPs and returnees; and
- (iv) Augment the municipal government's planning capacity by financing road connectivity and drainage network assessment in Mogadishu.<sup>1</sup>

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<sup>1</sup>Due to funding limitations, this road connectivity and drainage network assessment is only being carried out in Mogadishu. Funds will be sought to expand these assessments to Garowe and other key urban areas.

## 1.2 Project Component

The project has three components that are proposed for duration of 36 months: (i) Mogadishu; (ii) Garowe; and (iii) contingent emergency response. The sub-components under Garowe Component are the following:

**Infrastructure:** will finance four secondary roads in Garowe covering an estimated total of 4.86 km. These are all existing roads that have been severely damaged due to lack of maintenance. Three roads are within the city while one (Jilab) is a road that connects the Garowe with the IDP camp located outside the city.

S/n	Road Name	Length (Kms)	Description	Total Width of Road
1	Sheikh Abdisalam	1.1	Carriageway (7m), drainage (1.5m) and Walkway (1.5m)	10m
2	Gen. Nur Salad	1.0	Carriageway (7m), drainage (1.5m) and walkway (1.5m)	10m
3	Street 28 (Sagal)	1.8	Carriageway (7m), drainage (1.5m) and walkway (1.5m)	10m
4	Jilab	0.96	Carriageway (7m), drainage (1.5m) and walkway (1.5m)	10m
	<b>Total</b>	<b>4.86</b>		

**Capacity Building:** will support the capacity building of the PIU in Garowe Municipality with a focus on financial management, procurement and environmental and social safeguards and engineering.

**Operation and Maintenance (O&M)** will finance the development of O&M plans for the road and drainage investments including support to the Maintenance Committees at the district level as well as training of the GM unit responsible for infrastructure maintenance. Maintenance of the roads is expected to be financed by Garowe Municipality.

**Project Management:** will finance project management costs i.e. - staffing of a PIU in Garowe; audits; implementation of a grievance redress and feedback mechanism (GRM) related to project activities; and monitoring and evaluation of project activities including geo-enabled monitoring.

## 1.3 Scope of the ARAP

The aim of this ARAP is to provide an action plan that will ensure that the PAPs are properly compensated; their livelihoods and standards of living are restored. The ARAP developed based



on the principles laid out in the RPF of SURP. The ARAP includes identification of PAPs, inventory survey of property and valuation and compensation, consultation of PAPs, establishing a grievance redress mechanism, arrangements for implementation and monitoring and budget and implementation schedule.

#### **1.4 Cut-off date**

The entitlement cut-off date in lieu of this ARAP refers to the timeframe announced by GM beyond which no more claims could be made for inclusion on the list of PAPs, and at which point no assessment of new persons and their property outside the recorded list would be undertaken. The cut-off date was determined through a meeting with the PAPs, GM officials and PIU staff, before the commencement of the census survey on 18<sup>th</sup> August, 2018. The agreed cut-off date was 25<sup>th</sup> August, 2018.

#### **1.5 Methodology**

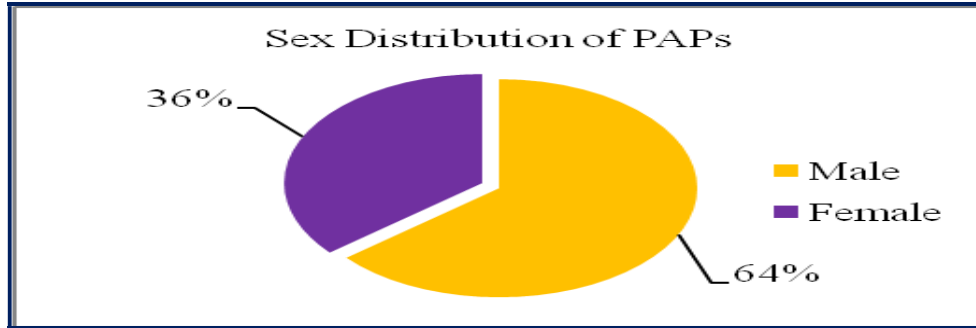
The preparation of this ARAP was through a combination of desk study, surveying of the project areas and affected land and property, socioeconomic survey and assessment of the PAPs, census of the PAPs, their assets and property, and valuation of the land and property thereon to be expropriated. The desk study involved review of project documents and analysis of the proposed subproject feasibility report including preliminary technical design and topographical survey report of the project sites. The field survey consisted on conducting household census of identified PAPs; conducting social assessment of the subproject sites in the three sites including socioeconomic study of the Project Affected Households (PAHHs) as well as census and measurement of their land, and assets, property which will be affected by implementation of the SURP subprojects. Meeting and discussions with PAPs and key stakeholders including District Authority was also undertaken and significantly informed the preparation of this ARAP.

## **2. SOCIO-ECONOMIC CONTEXT OF PAPs**

The total number of project affected persons is 98 and total project affected households are fourteen with different social and economic background, which determines their type and way of life, standards of living and economic or purchasing power. These are described in the following sub-sections.

## 2.1 Sex

The sex distribution of the respondents/PAPs of the 14 PAHs was 36% female, while the male was 64%.



Source: Field Survey, Sept, 2018

## 2.2 Marital Status

The majority of the PAHs are married. Sixty-four percent (64%) of the affected households are married, while twenty-one percent (21%) were widowed and fourteen percent (14%) of them compose single and divorced individuals respectively.

## 2.3 Age

The PAHs belong to different age ranges. However, half of the PAHs; fifty percent (50%) are between age ranges of 40-49. Thirty-six percent (36%) of them their age ranges between 50-59 years, seven percent (7%) his age is above 60 years and another seven percent (7%) is less than 30 years of age.

**Table 1: Age of the respondents**

Age ranges	Frequency	Percentage (%)
Below 30 years	1	7
30 – 39 years	0	0
40 – 49 years	7	50
50 – 59 years	5	36
60 and above	1	7
<b>Total</b>	<b>14</b>	<b>100</b>

Source: Field Survey, 2018

## 2.4 Education level

Thirty-six (36%) of the PAHs had primary level of education, Twenty-nine percent (29%) had secondary level of education, fourteen percent (14%) had graduate level of education, while twenty one percent (21%) of them had not attended any school.

## **2.5 Household size**

Majority (57%) of the PAHHs have a household size of 7-9 persons.

**Table 2: Household size**

<b>Household size</b>	<b>Household</b>	<b>Percentage (%)</b>
1-3	2	14
4-6	4	29
7-9	8	57
10 and above	0	0
<b>Total</b>	<b>14</b>	<b>100</b>

**Source: Field Survey, 2018**

## **2.6 Length of time PAPs lived in the area**

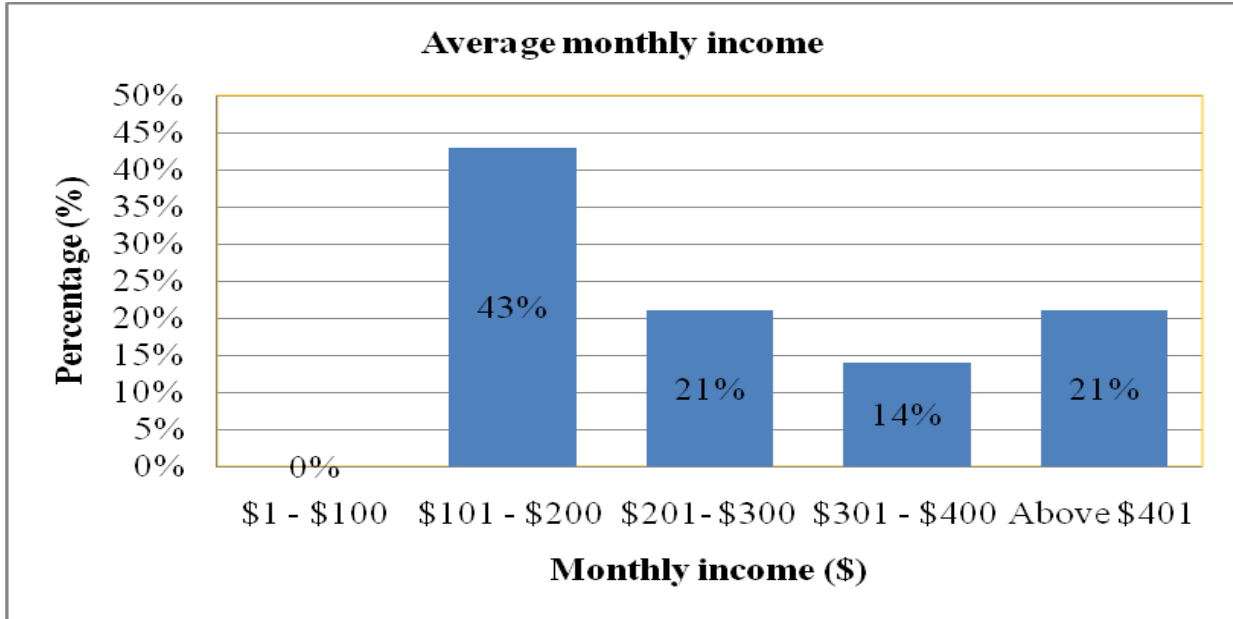
PAHHs have lived the area for many years and they have legal rights of their property. 64% of them have lived the area more than 15 years, while 21% lived the area between 10-15 years and 14% lived between 5-10 years.

## **2.7 Occupation**

Twenty-nine (29%) of the PAHHs are drivers and self-employed with some engaged in business of sales of milk, clothes, welding services, tailoring, etc, while fourteen percent (14%) of them are shop keepers as well as teachers. Seven percent (7%) are civil servant as well as an elder respectively.

## **2.8 Average monthly income**

Figure 1 below shows the average monthly income as stated by the PAHHs. Forty-three percent (43%) of the PAHHs earns an average income of between one hundred and two hundred Dollars, while twenty-one percent (21%) have an average income of between two hundred and three hundred dollars, fourteen percent (14%) of them ears between three hundred and four hundred dollars and twenty-one percent (21%) earns more than four hundred dollars per month.



**Figure 1 Average income of PAPs**

**2.9 Vulnerable groups**

Vulnerable groups that were identified amongst the PAPs during the census included one person who is in the category of elderly (above 60) and physically challenged person (i.e blind) and two female household heads with dependents respectively. The Table below shows the number of vulnerable people among the PAPs.

**Table 3: Number of vulnerable groups**

Description	Number of female household heads (widowers)	Number of physical challenged person (blind) and elderly	Total
Vulnerable people among the PAPs	2	1	3

**2.10 Access to social services**

All the residents near the three roads (with the exception of Jilab) have close access to social services such as schools and health posts. Along the selected roads under the support of SURP project there are several existing social service delivery centers including health centers, schools, hotels and other business places. In general, the type and number of facilities/services along the roads include two schools or learning centers, two health centers, two hotels, and ten shops.

### **3. POTENTIAL IMPACTS AND PAPS**

The construction of roads will require limited land take within the 10ms width of the roads. All the four roads are rehabilitation and upgrading of existing gravel road that is severely damaged to a tarmac road. The road is within the existing road width and the impact is limited to few sections of the roads where the road has been encroached by extended fences and few structures. This will impact on few permanent and semi-permanent structures such as fences before the construction period.

#### **3.1 Project benefits**

The main project beneficiaries will be the residents of Garowe city and road users, including those affected by forced displacement (i.e. IDPs, returnees, refugees) and host communities where the secondary road rehabilitation and construction is being carried out. The project will improve access for social services and market by improving road conditions. The construction activity is estimated to create short term employment for 250 people (18,000 person days of labor). Garowe Municipality and staff will benefit from capacity building initiatives in this project.

#### **3.2 Project adverse impacts**

The total number is 14 households (98 persons). These are all households owning some structures within the 10m width of the roads. The main cause of impact is the construction of the drainage system (1.5ms wide). There are no assets affected due to construction of the Jilab Street.

- General Nur Salad road: the numbers of PAPS/PAHs are two;
- Sheikh AbdiSalam road: the numbers of PAPS/PAHs are ten; and
- Street 28: the numbers of PAPS/PAHs are two.

#### **3.3 Loss of asset-structures**

The type of assets affected is mainly boundary walls and structures which are made of iron sheets and concrete or stone cut blocks. The structures are located within the Right of Way (RoW). There is no physical relocation of PAHs except merely partial loss of fences and structures.

**Table 4: Summary of affected assets**

Type of asset	Quantity	Required size to be demolished (meter)
boundary walls	5	1
Structures only	3	1
Structures with walls extending to the roads or walls forming part of boundary walls to the property	6	1

### **3.4 Temporary loss of income**

Affected shops and kiosks which will be closed due to the effect of the project will be given consideration for loss of business income. There are two shops which are affected by the project and the owners of these shops will be given cash assistance based on the number of days taken by the rehabilitation of assets and their current daily incomes.

### **3.5 Temporary disruption of access**

The project has no adverse impact on the access of people to social centers such as health centers, schools, and mosques which are located along the selected roads.

### **3.6 Assistance to vulnerable groups**

Assistance for vulnerable groups shall be administered by GM through the GRM committee in consultation with the vulnerable individuals among the PAPs. Two PAPs who are among the vulnerable groups are shop keepers who are also female household heads (widowers). In addition to cash assistance due to loss of income during the rehabilitation of their structures, the Municipality will provide business start-up grant which would help them to maintain and/or improve their income generation potential. The other vulnerable person is physical challenged (blind) elderly man and the Municipality is committed to cover his medical support for a period of three months.

#### **4. COMPENSATION AND ASSISTANCE**

Compensation for PAPs has been taken into consideration the fact that GM will pay all costs associated with the rehabilitation of PAPs affected assets.

##### **4.1 Entitlement Matrix**

The RPF clearly articulates the basis of what is to be paid as compensation by properly identifying the most suitable entitlement for the loss that may be encountered on this project. Therefore, the entitlement matrix presented in table below offers a framework for this ARAP for bridging gaps between requirements under the Puntland Law and the World Bank Operational Policies.

Consequently, in order to bridge the gap between both requirements under Puntland Law and the World Bank Ops, it is emphasized that the higher of the two standards should be adapted as it also satisfies the requirements of the lesser standard.

**Table 5: Entitlement Matrix**

<b>Category of PAP</b>	<b>Type of Asset Loss</b>	<b>Entitlements</b>
Property owner	Partial loss of structures and fences	Cash compensation for full replacement cost of fixing affected assets without depreciation which is acceptable to the PAPs.
Business owner	Loss of income	Cash compensation equivalent to 50% of net monthly income based on estimates from comparable businesses for length of time access is lost (temporary loss of access). Right to salvage material without deduction from compensation Livelihood restoration assistance if required (assistance with job placement, skills training)

Vulnerable persons	Economic displacement	Assistance for vulnerable groups will be administered by GM through the GRM committee in consultation with the vulnerable individuals among the PAPs. Two PAPs who are among the vulnerable groups are shop keepers who are also female household heads (widowers). In addition to cash assistance due to the loss of income during the rehabilitation of their structures, the Municipality will provide business start-up grant which would help them to maintain and/or improve their income generation potential. The other vulnerable person is physically challenged (blind) elderly man and the Municipality is committed to cover his medical cost and support for a period of three months.
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All PAPs irrespective of their status in terms of having formal titles, legal rights or encroaching illegally on land are eligible for compensation.

#### **4.2 Disturbance Allowances**

As guided by the RPF, disturbance allowance of one month shall be awarded to the tenants on top of the total assessed compensation amount. The two female tenants located at Gen. Nur Salad road and they are eligible for provision of disturbance allowance during the construction stage.



## **5. ASSET INVENTORY AND VALUATION**

Asset inventory was conducted on 18<sup>th</sup>-25<sup>th</sup> of August 2018 with the presence of the property owners. A committee composed of PIU<sup>2</sup> and GM Directors<sup>3</sup> were conducted the inventory and census of PAPs. The property owners have agreed for the measurement of affected assets. In addition, the PAPs understood compensation option and the valuation of assets was done by the Project Engineer with GM Engineer.

The valuation method was guided by the World Bank Policy 4.12 on involuntary resettlement by utilizing the general principle adopted in the formulation of the compensation valuation that lost assets will be valued at their full replacement cost<sup>4</sup> such that the PAPs should experience not net loss and has been conducted using the current market prices in the project area.

Land acquisition is not anticipated under the SURP Project for Garowe City and physical relocation will not be carried out. Therefore, valuation of assets for this project is concerned with compensation of partial loss of assets of PAPs due to the project.

## **6. CONSULTATIONS WITH PAPs**

Consultation meetings with PAPs led by GM were held since September 15 2018, to discuss issues related to partial property demolishing and compensation. The Safeguard Specialist, together with project Engineer, Project Coordinator and local authority, held community engagement with members of the village residents who are economically better-off. The purpose of the consultation meeting was to disclose the project goal, targets and the proposed road infrastructure subprojects in Garowe City. This was followed up with another meeting with the potential PAPs following the survey of the required size (in meters) for the planned developments. The local communities were fully involved in all the processes of the development of this ARAP and are well informed about the planned project.

Main issues raised by the PAPs during the meetings and responses.

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<sup>2</sup> Environmental and Social Safeguard Specialist and Project Engineer

<sup>3</sup> Director of Public Works and Director of Social Affairs at GM

<sup>4</sup> Including market price for materials, labor, loading and unloading and transportation costs

**Table 6: Questions asked by the PAPs and the responses**

<b>Main concerns raised</b>	<b>Responses and agreements</b>
When will the project start?	The civil works of SURP project will start in March 2019
What is the standard size of the roads width?	The standard size of roads is 10m: 7m is for carriage-way, 1.5m drainage and 1.5 pedestrian. In addition, these roads are Otta-seal pavement.
Who is responsible for compensation of the damages associated with road construction project?	The responsibility of all compensation costs will be paid by the municipality.
Why don't you reduce the width of the roads (from 10-8m)	The width of the roads cannot be reduced because these are urban road which possesses carriage-way, drainage and pedestrian/sidewalk.

During community consultation meetings, GM proposed to PAPs to choose the options of the Municipality to hire a contract to perform all rehabilitation works on affected assets or being given cash compensation. The majority of the PAPs agreed that contractor to be given to perform rehabilitation works on their affected assets. It was also agreed that PAPs who do not accept the proposed option will be given cash compensation to rehabilitate their affected structures or fences. GM is committed to assure high quality for the rehabilitation of the affected structures of the PAHs in order to minimize any associated grievances.

**Table 7: PAPs that agreed the contractor to rehabilitate affected structures and fences**

<b>No.</b>	<b>Name of the PAP</b>	<b>Location/Village</b>	<b>Road name</b>
1	Faduma Mohamed Ahmed (Ar)	Hanti-wadag	Sheikh AbdiSalam
2	Ahmed Abdulahi Samatar (Leyli)	Hanti-wadag	
3	Saido Abdirahman Moalim Dahir	Hanti-wadag	
4	Farhia Ibrahim Aden	Hanti-wadag	
5	Halima Osman Mohamed Omar (Hirey)	Hanti-wadag	
6	AbdiKafi Ahmed Said	Hanti-wadag	
7	Farah Saed Mohamed	Hanti-wadag	
8	Shukri Dahir Liban Ali	1 <sup>st</sup> August	Gen. Nur Salad
9	Arda Hassan Sooyaan	1 <sup>st</sup> August	

**Table 8: PAPs who have not accepted the contractor to rehabilitate affected structures and fences**

No	Name of the PAP	Location/Village	Road name
1	Dhuh Moalim Abdulkadir	Hanti-wadag	Sheikh AbdiSalam
2	Abdulkadir Osman Samatar	Hanti-wadag	
3	Ibrahim Caseyr Gurase	1 <sup>st</sup> August	Street 28 (Sagal)
4	Abdikarim Ali Awale	1 <sup>st</sup> August	
5	Dalab Abdi Kadawe	1 <sup>st</sup> August	

## **7. LIVELIHOOD RESTORATION**

Livelihood restoration is aimed at ensuring that living standards of the PAPs restored. Particularly, there are three shops of which two shops are located at Gen. Nur Salad road and one at Sheikh AbdiSalam, the shop owners who lost their source of livelihood will be provided an assistance, to improve and restore their income and standard of living. PAPs will also be encouraged and supported to take up available employment opportunities that will be created by the implementation of the SURP during the construction of the proposed roads infrastructure in Garowe.

## **8. GRIEVANCE REDRESS MECHANISMS (GRM)**

In case of any dissatisfied person, it was made clear to the PAPs that the complaint should be recorded and filed by the GRM to handle any claims before and during the implementation of SURP project in Garowe City. Garowe Municipality established GRM Committee for each road which constitutes PAP's representatives, IDPs, traditional elders, religious leaders, Local Government representatives and Safeguards Specialist and they will solve any concerns and complaints issued by the PAPs in their respective areas. The GRM is for the benefit of the project and the PAPs and is expected to amicably and in a timely manner resolve any disputes that arise with the compensation process and activities. GM will follow up the aggrieved PAPs at each level to ensure that grievances are resolved. Grievance submission channels should be put in place. Viable channels include phone hotline, email, SMS and face-to-face meeting among the stakeholders.

Among the areas where the GRM Committee will provide assistance are in:

- Register the grievances raised by the PAPs;
- Gathering and sharing information and avoiding potential problems;
- Create awareness among the communities living along the roads;
- Address the grievances forwarded by the PAPs representatives;
- Mobilization and motivation to PAPs to clean their surroundings and remove debris after rehabilitation of structures and fences;
- Developing information campaigns and community participation; and
- Strengthening local institutions and community self-reliance.

The PAPs will have the opportunity to file their complaints to the district level GRM and will be responded within three days of launching their complaint. The process to be followed is as follows: i) inform all PAPs of grievance resolution process during initial community meeting; ii) record and file complaints through grievance resolution committee; iii) grievance log will be kept by the Local Government; iv) Complaint investigation by the committee; v) reaching of agreeable solutions; and vi) inform the community of the reached solution and informing the PAPs in writing. In the case that the PAP is not satisfied with identified solution they will be assisted to file a complaint with the District Housing and Land Conflict Arbitration Committee. If the grievance is not resolved via the local leadership structure and the District Housing and Land Conflict Arbitration Committee upholds the original value, the complainant final resort shall be to file the case to the competent Court of Law. The decision of the Court of Law will be final and binding.

## **9. ORGANIZATIONAL RESPONSIBILITIES**

GM is the lead institution in implementing this ARAP. Furthermore, GM is also responsible for paying all compensation costs according to agreements made with PAPs. The overall responsibility of managing the implementation process of the project will vest under GM who constitutes a Project Implementation Unit (PIU) comprising of senior management staff. The Unit will coordinate the project with other government Ministries. The Unit will oversee the operations of the GRM Committee. The Committee will operate within the guidelines given by the PIU in cognizance of the Puntland State and Bank's policies on safeguards. In addition, the

Municipality will be responsible for contracting and supervising of the contractor during the rehabilitation of partially affected assets of the PAPs.

## **10. MONITORING AND EVALUATION**

Considering the situation post evaluation of census and ARAP, the internal monitoring and supervision must consider:

- To verify that the evaluation of assets damaged, and the provision of compensations and other rehabilitation entitlements, has been carried out in accordance with the RPF;
- To oversee that the ARAP is implemented as designed and approved;
- To verify that funds for implementation of the ARAP are provided by the authorities in a timely manner and in amounts sufficient for their purposes, and such funds are used in accordance with the provisions of the ARAP.

The main internal indicators to be monitored regularly are:

- Rehabilitation works of affects structures as per the agreed timeframe and assurance of meeting the required quality;
- Revival of livelihood activities for the affected persons within a short period of time after the rehabilitation of structures and fences; and
- Public information and consultation and grievance procedures are followed as described in the ARAP.

## **11. IMPLEMENTATION SCHEDULE**

There will be a series of steps to be followed during the implementation of ARAP as shown in the Table 9 below.

**Table 9: Implementation schedule**

<b>S/n</b>	<b>Activity description</b>	<b>Responsible Institution</b>	<b>Timing</b>
1	Public consultation: consultation meeting with the PAPs to inform them on scheduled activities and their roles to accomplish the ARAP activities	GM	August 2018
2	Measurement and documentation of affected structures, property and other assets	GM	September 2018
3	Display the results of the census to the PAPs	GM	October 2018

4	Preparation and signing of agreement for compensation	GM	November 2018
5	Compensation payment ( <i>this is applicable to PAPs who have not accepted that the contractor to rehabilitate their structures</i> )	GM	December 2018
6	Notification of removal of assets	GM	December 2018
7	Grievance redress	GM	December 2018
8	Removal of assets	GM	December 2018
9	Commencement of asset rehabilitation	GM	December 2018
10	Completion of asset rehabilitation and reconstruction	GM	January 2019
11	Disclosure of the ARAP to general public	GM	January 2019
12	Follow up of the implementation of ARAP	GM	January-February 2019

## **12. RESETTLEMENT IMPLEMENTATION COMPLETION AUDIT**

A completion report of the entire resettlement process for this project will be prepared and will ostensibly provide a verification of when the compensation and assistance were undertaken and to whom these services were provided as well as to indicate that indeed all compensation has been delivered.

This report will be prepared and submitted to the Municipality and the Bank one month after the end of compensation payment by GM, together with PIU. The ARAP implementation report will include (but not limited to) the following information:

- Background of the ARAP preparation including a description of the project activities, scope of impacts, number of affected persons, and estimate budget;
- Update of its implementation with compensation paid, issues/complaints raised and solutions provided;
- Complaints status;
- Early assessment of the impacts of resettlement and compensation on affected categories at the time of the report production;
- Total sum disbursed; and,
- Lessons learned from the ARAP implementation

### 13. BUDGET ESTIMATE FOR ARAP

Table 10 gives a summary of the ARAP Total Budget Estimate of Twenty-Six Thousand, Eight Hundred Thirty-One and Nine Cents Only (\$26,831.9). This Budget Estimate has six components: (i) Cash assistant to blind old man amounting Three Hundred amounting (\$300); (ii) Support to two vulnerable female household heads amounting to One Thousand (\$1000); (iii) Loss of income for business owners/women amounting One Hundred Ninety-Six (\$196); (iv) Disturbance allowance amounting to Four Hundred (\$400); (v) Compensation cost for loss of assets amounting to Twenty-Two Thousand, Four Hundred and Ninety-Six and Sixty Four Cents (\$22,496.64); and (vi) Contingency cost of (10%) amounting to Two Thousand, Four Hundred Thirty-Nine and Twenty-Six Cents only (\$2,439.26).

**Table 10: ARAP Budget Estimate**

No.	Item description	Units (months/days)	Quantity	Unit Cost (\$) daily income	Total Cost (\$)
1	Cash assistance to one vulnerable person who is blind and old for medical support over three months	3	1	\$100.00	\$300.00
2	Provision of business start-up grant for the two vulnerable female household heads	1	2	\$500.00	\$1,000.00
3	Cash assistance to two shop owners for loss of income for a period of two weeks	14	2	\$7.00	\$196.00
4	Disturbance allowance	1	2	\$200.00	\$400.00
	<b>Sub total</b>				<b>\$1,896.00</b>
5	Compensation for loss of assets for 14 households				\$22,496.64
	<b>Total</b>				<b>\$24,392.64</b>
	Contingency (10%)				\$2,439.26
	<b>Grand Total</b>				<b>\$26,831.90</b>

### 14. CONCLUSION

This ARAP has been prepared for 14 households who are residing along the selected roads rehabilitation in Garowe City under the SURP project. The project will be funded by the WB. Since the Project involves only roads rehabilitation, it was deemed necessary to prepare an

ARAP to cover only people affected by the project. Preparation of this ARAP was guided by WB's Operational Safeguard Policies.

Inherently, an ARAP formulation prompts engagement in a consultative process with parties involved so that their entitlements are taken care of. This ARAP is a result of a consultative process between stakeholders in GM, the affected people and business communities.

The total estimated budget for the ARAP is **Twenty-Six Thousand, Eight Hundred Thirty-One and Nine Cents USD only**. Furthermore, this ARAP provides a roadmap for the grievance mechanism which PAPs should use to get their issues resolved.



**REFERENCES**

Environmental and Social Management Framework (ESMF) for Garowe SURP

Resettlement Policy Framework (RPF), SURP

Project Appraisal Document (PAD), SURP

**ANNEXES**

**Annex 1: Inventory of PAPs and their affected assets and associated costs**

#	Name of PAP	Sex	Type of asset	Level of affect, maximum area (m)	Location	Compensation amount (USD)
1	Faduma Mohamed Ahmed (Aar)	F	Structure	1	Hanti-wadag	\$3,075.89
2	Ahmed Abdulahi Samatar (Leyli)	M	Fence with structure	1	Hanti-wadag	\$2,737.33
3	Dhuh Moalim Abdulkadir	F	Structure	1	Hanti-wadag	\$329.00
4	Abdulkadir Osman Samatar	M	Fence	1	Hanti-wadag	\$893.21
5	Saido Abdirahman Moalim Dahir	F	Fence with structure	1	Hanti-wadag	\$1,539.20
6	Farah Saed Mohamed	M	Fence	1	Hanti-wadag	\$393.13
7	Farhia Ibrahim Aden	M	Fence with structure	1	Hanti-wadag	\$2,449.21
8	Halima Osman Mohamed Omar	M	Fence	1	Hanti-wadag	\$1,032.09
9	AbdiKafi Ahmed Said	M	Structure	1	Hanti-wadag	\$2,377.33
10	Shukri Dahir Liban Ali	F	Fence with structure	1	1da Augusto	\$1,693.04
11	Arda Hassan Sooyaan	F	Fence with structure	1	1da Augusto	\$1,595.98
12	Abdikarim Ali Awale	M	Fence	1	1da Augusto	\$1,880.17
13	Ibrahim Caseyr Gurase	M	Fence with structure	1	1da Augusto	\$1,124.10
14	Dalab Abdi Kadawe	M	Fence	1	1da Augusto	\$1,376.96
15	Cash assistance for vulnerable blind man					\$300.00
16	Support for business start-up grant					\$1,000.00
17	Cash assistance to shop owners for loss of income					\$196.00
18	Disturbance allowance					\$400.00
	<b>Sub-total Direct Implementation Costs</b>					<b>\$24,392.64</b>
	<b>Contingency (10%)</b>					<b>\$2,439.26</b>
	<b>Grand total Direct Implementation plus Contingency</b>					<b>\$26,831.90</b>

**Annex 2: Photos of the roads taken during the census survey**



**Gen. Nur Salad Street**



**Sheikh AbdiSalam Street**



**Jilab Street**


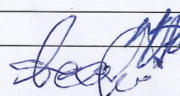

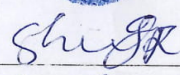


**Jilab Street**

**Annex 3: Agreement between the Municipality and the PAPs who have accepted contractor to reconstruct their assets**

- 3) The Municipality has agreed that a realistic schedule for re-construction of structures will be agreed with contractor and shared with PAPs.
- 4) The Municipality will be responsible for monitoring of the work and addressing any issues related to schedule or quality of construction.
- 5) PAPs have agreed to cooperate with contractor during demolition and re-construction.
- 6) PAPs will use the grievance mechanisms described in the ARAP to address any grievances related to the agreement.

The table below shows the names and signatures of the PAPs who agreed the proposal.

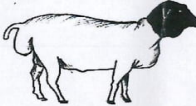
No.	Name of the PAP	Location/Village	Road name	Contact	Signature
1	Faduma Mohamed Ahmed (Aar)	Hanti-wadag	Sheikh AbdiSalam	0907-794800	
2	Ahmed Abdulahi Samatar	Hanti-wadag		0907-763811	
3	Saido Abdirahman Moalim Dahir	Hanti-wadag		0907-743645	
4	Farhia Ibrahim Aden	Hanti-wadag		0907-653146	
5	Halima Osman Mohamed Omar (Hirey)	Hanti-wadag		0907-7554750	
6	Farah Said Mohamed	Hanti-wadag	0907-741919		
7	Shukri Dahir Liban Ali	1 <sup>st</sup> August	Gen. Nur Salad	0907-742592	
8	Arda Hassan Sooyaan	1 <sup>st</sup> August		0907-786950	

This agreement is signed on 04 day of 12/, 2018 in Garowe, Puntland State of Somalia.

For the Municipality of Garowe  
 Mohamed Ali Mohamed,  
 Deputy Mayor of Garowe City



**Annex 4: Agreement between the Municipality and the PAPs who have not accepted contractor to reconstruct their assets**



**DAWLADDA HOOSE  
EE GAROOWE**

**THE LOCAL GOVERNMENT  
OF GAROWE**

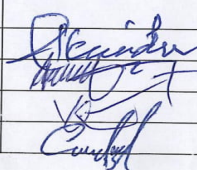
**SOMALIA URBAN RESILIENCE PROJECT (P163857)  
PROJECT IMPLEMENTATION UNIT  
PUNTLAND STATE OF SOMALIA  
GAROWE MUNICIPALITY**

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**AGREEMENT FOR PROVISION OF CASH COMPENSATION OF AFFECTED STRUCTURES  
BETWEEN  
GAROWE MUNICIPALITY  
AND  
PROJECT AFFECTED PERSONS**

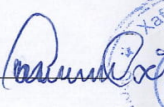
This agreement for rehabilitation works is entered into this 04/12, 2018 by and between Garowe Municipality (hereinafter “Municipality”) and Project Affected Peoples (PAPs) related to Somalia Urban Resilience Project (SURP) road construction activities.


The Municipality and five individuals among the PAPs agreed provision of cash compensation option. The cash compensation of full replacement cost of rehabilitating affected assets without depreciation is agreed by both parties. The below table shows five individuals who requested and received cash compensation.

No	Name of the PAP	Location/Village	Road name	Contact	Signature
1	Dhuh Moalim Abdulkadir	Hanti-wadag	Sheikh		
2	Abdulkadir Osman Samatar	Hanti-wadag	AbdiSalam	0907-794053	
3	Ibrahim Caseyr Gurase	1 <sup>st</sup> August		0907-741111	
4	Abdikarim Ali Awale	1 <sup>st</sup> August	Street 28	0907-796524	
5	Dalab Abdi Kadawe	1 <sup>st</sup> August	(Sagal)	0907-746281	

This agreement is signed on 04 day of 12, 2018 in Garowe, Puntland State of Somalia.

For the Municipality of Garowe  
Mohamed Ali Mohamed, \_\_\_\_\_  
Deputy Mayor of Garowe City





## **Annex 5: Terms of Reference for Grievance Redress Committee for SURP in Garowe City**

### **Terms of Reference for Grievance Redressal Committee**

#### **1. INTRODUCTION**

As part of its community liaison process, Garowe Municipality will implement a Grievance Mechanism to ensure that all stakeholder comments, suggestions and objections are captured and considered. It will allow the affected community and the workers to express their concerns and any complaints directly to Garowe Municipality.

#### **1.1 PURPOSE**

The purpose of this Grievance Redressal Committee is to outline the Project's approach to accepting, resolving, and monitoring grievances, comments and suggestions from those affected by the Project's activities:

- Construction workers and supplies (Contractor)
- Community members

Timely redress and resolutions of grievances is vital to ensure successful implementation of the Project. All complaints will be handled without prejudice.

The process covers all components and activities of the Project, including those activities undertaken by subcontractors on behalf of the Project.

#### **1.2 DEFINITION GRIEVANCE**

A grievance is considered to be any complaint about the way a project is being implemented. It may take the form of specific complaint about impacts, damages or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments have been addressed, and concerns about Project activities during construction or operation, or perceived incidents or impacts.

A grievance is defined as an issue, concern, problem or claim (perceived or actual) that an individual or community group wants a company or contractor to address and resolve, for example.

- Specific complaint about impacts, damages or harm caused by the Project,
- Concerns about access to the project stakeholder engagement process and how grievances have been address,
- Concerns about Project activities during construction or operation, or perceived incidents or impacts.

Also positive feedback and suggestions may be filed via the Grievance Redressal Committee.

## **2. ROLES AND RESPONSIBILITIES**

Roles and responsibilities under this Procedure are as follows:

- Address the risks and impacts on the PAPs;
- Ensure accessibility of an individual or group at no cost (vulnerable groups)
- Ensure transparent and conduct regular monitoring and reporting;
- Identify and records any issues, concerns and complaints from the PAPs;
- Discuss and resolve issues, concerns and complaints which are submitted by the PAPs;

## **3. GRIEVANCE PROCEDURE**

- 1. Receive a grievance:** Stakeholders shall be able to use the following methods to submit a grievance:

The grievance is recorded and classified in the ‘Complaints register’ by Garowe Municipality’s Executive Secretary. The Grievance Log will be held at Office of the Executive Secretary.

If the Complaint is readily resolvable and can be dealt with immediately, the Executive Secretary takes action to address the issue directly and records the details in the Complaints Register.

- 2. Grievance is formally acknowledged** through a personal meeting, phone call, or letter as appropriate, within 5 working days of submission. If the grievance is not well understood or if additional information is required, clarification should be sought from the complaint during this step.
- 3. The Complaint Manager delegates the grievance** in writing the relevant department/personnel/contractor from development of an appropriate response. The Complaints Manager will estimate the subject matter of this grievance and identify the risk category. If required, the grievance may be sent for consideration of the senior management.
- 4. A response is developed** by the delegated team and Complaints Managers with input from the Senior Management and others, as necessary.
- 5. Required actions are implemented** to deal with the issue, and a completion of these is recorded on the grievance log.
- 6. The response is signed-off** by the Complaints Manager. The sign-off may be a signature on the grievance log or in correspondence which should be filed with the grievance to indicate agreement.
- 7. The response is communicated to the affected party;** the response should be carefully coordinated. The Complaint Manager ensures that a suitable approach to communicating the response to the affected party is agreed and implemented. The response to a grievance will be provided 20 working days after receipt of the grievance.
- 8. The response of the complainant is recorded** to help assess whether the grievance is closed or whether further action is needed. The Complaints Manager will use appropriate



communication channels, most likely telephone or face to face meeting, to confirm whether the complainant has understood as is satisfied with the response. The complainants' response should be recorded in the Complaints Register.

9. **The grievance is closed** with sign-off from the Complaints Manager, who determines whether the grievance can be closed or whether further attention and action is required. If further attention is required the Complaints Manager should return to Step 2 to re-assess the grievance and then take appropriate action. Once the Complaints Manager has assessed whether the grievance can be closed, he/she will sign off to approve closure of the grievance on the grievance log or by written communication.

If actions taken on a grievance are not successful, a stakeholder may return to court in accordance with the existing legislation of Puntland State of Somalia. The Grievance Form is presented in the Appendix to this document.

#### **4. COMPLAINT REGISTER**

It is important that issues raised by the stakeholders are recorded in a logical and systematic way so that they can be tracked through to appropriate resolution and closure. The committee will record:

- Reference number for the stakeholder;
- Name and contact details;
- Date of contact (s);
- Issue (s) raised (comment, suggestion, question, complaint, etc);
- Proposed response and actions to be taken; and
- Status (recorded, active, closed).

Where many stakeholder raise similar issues these will be grouped as “issues” and responses to them will be tracked together in a separate section of the register. An appropriate cross-reference will be made in the response column in the main register.

#### **5. COMMUNICATION**

This Grievance Mechanism will be disclosed to

- a) The workers (as part of the Induction Training) and
- b) The communities neighboring the Project site

By consulting with local communities regarding the Grievance Mechanism, the Project will ensure that the process is considered by community members to be culturally appropriate, trustworthy and effective.

## **6. CONFIDENTIALITY**

If a Complainant wishes to remain anonymous this will be accepted. No personal data will be made public. Details of the grievance will only be provided to those directly involved in the examination process (i.e those involved with remedying the grievance).

**Annex 6: Grievance Registration Form**

**CONTACT INFORMATION**

Name:

Gender:       Male                       Female

Address:

Location/Village:

Telephone:

E-mail:

Anonymous grievance:  Yes               No

Preferred mode of communication for feedback:       Mail               Phone               E-mail

**DESCRIPTION OF GRIEVANCE/SUGGESTION/QUESTION**

Please provide details (who, what, where, when) of your grievance below: In case any other actions were undertaken by the complainant with respect to the grievance case, please provide details on past actions (if any): Please provide details on your suggested resolution for grievance:

**GRIEVANCE REGISTRATION DETAILS**

Name of registrant:

Organization:

Position:

How the grievance was lodged:       in person       e-mail               phone               \_\_\_\_\_

Type of grievance:  type A /  type B /  type C

Documents attached: Grievance is relevant to project:  Yes /  No if “No” it was forwarded to:

\_\_\_\_\_

Remarks:

Signature of registrant:

Date of grievance:

**Annex 7: Nomination letter for GRC**

- |                                 |       |
|---------------------------------|-------|
| 6. Shukri Dahir Liban           | Xubin |
| 7. Faadumo CabdiRaxmaan Macalin | Xubin |
| 8. Faysal Cabdi Muumin          | Xubin |
| 9. Maxamed CabdiRaxmaan Guure   | Xubin |
| 10. Deeqa Ahmed Miino           | Xubin |

Waxaan rajeynayaa in xubnaha guddigu ay shaqada ay si dhakhsa ah u gudagalaan si loo xaqiijiyo hirgelinta mashruuca waddooyinka Caasimada Garowe.

**Wada Shaqayn Wacan**

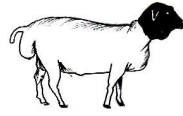
**Maxamed Cali Maxamed**



**Ku siisimaha Gudoomiyaha Golaha Degaanka Degmada Garowe**

**Ahna ku xigeenka Duqa Caasimadda Puntland**

**Annex 8: Community Consultation Meeting Minutes (Somali language)**



**Dawladda Hoose ee Degmada Garoowe  
Dawladda Puntland ee Soomaaliyeed**

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**KULAN LA TASHI DADKA MASHRUUCU UU SAAMEYNTA KU YEESHAY  
GAAR AHAAN WADDADA SHIIKH CABDISALAAM  
WAR MURTIYEEDKII KULANKA  
SIBTEMBER 24 2018**

Maamulka Dalwadda Hoose ee Garoowe oo uu hormuudka ka yahay Duqa Degmada Garoowe Axmed Siciid Muuse (Barre) waxa uu kulan la qaatay dadka degan hareeraha wadda Shiikh CabdiSalaam kuwaas oo saameyn kala kulmey mashruuca dhismaha kaabayaasha waddooyinka ee magaaladda Garoowe. Kulanka waxaa soo qabanqaabiyey xubno ka mid ah guddiga abaabulka bulshada xaafada Hanti-wadaag, gaar ahaan qoysaska waddada ag degan. Kulanka waxaa goob-joog dhammaan dadka mashruucu saameynta ku yeeshay. Kulanka waxaa shirgudoominayey Guddoomiye Ku xigeenka Degmada Gaarowe, Maxamed Cali Maxamed (Xamari), sidoo kale waxaa weheliyey Xoghayaha Degmada, Maxamuud Cali Gurey iyo Agaasimaha Waaxda Hawlaha Guud, Maxamuud Maxamed Jaamac.

Kulanka waxaa daah-furay gudoomiye ku xigeenka waxaana uu tibaaxay ujeedada shirka oo ahayd in la tashi lala sameeyo qoysaska mashruucu saameynta ku yeeshay. Saameyntaas oo ah in dadka degan hareera waddada laga dumin doono guryahooda cabbir dhan hal mitir. Sidoo kale waxa uu ka hadlay faa'iidooyinka iyo wixtarka ay waddada oo laami noqotaa ay u leedahay bulshada iyo dawladaba.

Intaas ka dib waxaa hadalo koob-kooban ka soo jeediyey Xogahaha Degmada, Agaasimaha Waaxda Hawlaha Guud, Injineerka Mashruuca, Maxamed Cabdullahi Axmed iyo La taliyaha Arrimaha Bulshada iyo Deegaanka, Faysal Cabdi Mumin. Dhammaantood waxay ka hadleen faa'iidada wadadu ay u yeelanayso dadka hareeraheeda degan, dad-weynaha ku nool magaalada Garoowe iyo Dawladda Hoose.

Intaas ka dib hadalkii waxaa lagu wareejiyey dadkii si loo dhageysto talooyinkooda iyo tabashooyinkooda.

Si guud haddii aan u dhigo, dadka<sup>5</sup> uu mashruucu saameynta uu ku yeelanayo oo dhan waa soo dhaweeyeen in halkii mitir laga dumiyo. Sidoo kale waxay ku qanceen fursada iyo faa'iidooyinka ay u leedahay waddadu. Haseyeeshee waxay cadeeyeen duruufaha haysta iyo

---

<sup>5</sup> Faadumo, Axmed (Layli), Siciido, CabdiKaafi, Dr. Ina Abuu Shacar, CabdiSalaam Xiirey

awoodooda dhaqaale ee aan u saamaxeyn in ay dib-u-dhistaan goobahooda. Waxay soojeediyeen in Dawladda Hoose ay kala qayb qaadata dib-u-dhiska goobaha la dumin doono<sup>6</sup>.

Intii kulanku socday waxaa ku soo biiray Duqa Degmada Garoowe, Axmed Siciid Muuse. Ugu horeyntii waxa uu bogaadiyey ka soo qeybgalayaasha kulanka. Waxa uu ka hadlay awooda dhaqaale ee ka jira maamulka degmada Garoowe. Waxa uu sheegay in labo ka mid ahaa ilihii dakhliga<sup>7</sup> uu hoos u dhac ka jiro waqtigan la joogo. Sidoo kale waxa uu ka hadlay arrimaha guud eek u xeeran mashruuca iyo sidii Garoowe ay uga faa'iidi lahayd si ay u hesho fursado kaalmo ee caalami ah. Waxa uu balan qaadeyn in afarta waddo ay noqon doonaan kuwo ka casrisan kuwii hore, gaar ahaan dhanka tayada iyo hufnaanta nidaamka loo hirgelin doono.

Ugu dambeyntii, wada hadal iyo dood badan ka dib, waxaa la go'aamiyey in:

1. Dawladda Hoose in ay dib is kugu noqoto oo ay ka soo fakarto wixii ay kaga qeyb qaadan lahayd dib-u-dhis goobaha la duminayo.
2. Dawladda Hoose in ay raadiso qandaraasle dib u dhisa goobaha la dumin doono.
3. Labada guri ee Xasan Xirsi iyo Faduma Maxamed Aar si gaar ah looga niqaasho oo kulan kale laga yeesho.

#### **Dadkii ka soo qeybgalay kulanka**

- |                                    |   |
|------------------------------------|---|
| 1. Maxamed Cali Maxamed            | Duq Ku xigeenka deg. Garoowe              |
| 2. Maxamuud Cali Gurey             | Xoghayaha deg. Garoowe                    |
| 3. Maxamuud Maxamed Jaamac         | Agaasimaha Waaxda Hawlaha Guud            |
| 4. Siciid Axmed Shirwac            | Injineer Dawladda Hoose Garoowe           |
| 5. Maxamed Cabdullahi Axmed        | Injineer Mashruuca                        |
| 6. Faysal Cabdi Muumin             | La taliye Arrimaha Bulshada iyo Deegaanka |
| 7. Cabdirisaaq Maxamed Agoon       | Ganacsade                                 |
| 8. CabdiXakiin Jaamac (Birre)      | Dadka mashruuca saameynta ku yeeshay      |
| 9. CabdiKaafi Axmed Siciid         | Dadka mashruuca saameynta ku yeeshay      |
| 10. CabdiSalaan Jaamac Saalax      | Ganacsade                                 |
| 11. Dr. Axmed Abu-Shacar           | Dadka mashruuca saameynta ku yeeshay      |
| 12. CabdiSalaam Cismaan Maxamed    | Dadka mashruuca saameynta ku yeeshay      |
| 13. Faarax Siciid Maxamed          | Dadka mashruuca saameynta ku yeeshay      |
| 14. Faadumo Maxamed Aar            | Dadka mashruuca saameynta ku yeeshay      |
| 15. Siciido Cabdiraxmaan M. Daahir | Dadka mashruuca saameynta ku yeeshay      |
| 16. Axmed Cabdullahi Samatar       | Dadka mashruuca saameynta ku yeeshay      |
| 17. Xaaji Xasan Xirsi              | Dadka mashruuca saameynta ku yeeshay      |
| 18. Maxamuud Axmed Faarax          | Ganacsade                                 |
| 19. Farxiya Ibraahim Aden          | Dadka mashruuca saameynta ku yeeshay      |
| 20. Dhuux Macalin Cabdulkadir      | Dadka mashruuca saameynta ku yeeshay      |

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<sup>6</sup> Deyrar iyo (ama) qolal

<sup>7</sup> Bixinta sabraloogooyinka iyo dhalashada iyo sugnaanta dadka Baasaboorka qaadanaya

Annex 9: Maps of the roads

