FEDERAL GOVERNMENT OF SOMALIA

SOMALIA URBAN RESILIENCE PROJECT II (P170922)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

VERSION II

September 30, 2019

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ACRONYMS AND ABBREVIATIONS

Abbreviation	Description
CPF	Country Partnership Framework
DG	Director General
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESCP	Environment and Social Commitment Plan
EU	European Union
FCV	Fragility, Conflict & Violence
FGS	Federal Government of Somalia
GBV	Gender-based Violence
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GIS	Geographic Information System
GNI	Gross National Income
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IDA	International Development Association
IPF	Investment Project Financing
LMP	Labour Management Procedures
NGO	Non-governmental Organization
OP	Operational Policy
PDO	Project Development Objective
PIU	Project Implementation Unit

Abbreviation	Description
PCU	Project Coordination Unit
RAP	Resettlement Action Plan
RPF	Resettlement Planning Framework
SCD	Systematic Country Diagnostic
SDG	Sustainable Development Goal
SEA	Sexual Exploitation and Abuse
SUIPP	Somalia Urban Infrastructure Planning Project
SURP	Somalia Urban Resilience Project
TA	Technical Assistance
TTL	Task Team Leader
WBG	World Bank Group

EXECUTIVE SUMMARY

Introduction. As Somalia emerges from nearly three decades of civil strife, the national road transport infrastructure, which is vital for the country's economic and social development, is in very poor condition. Due to a lack of railway infrastructure and limited coastal shipping, road transport is the principal mode of internal transport. Decades of conflict and fragility has prevented any significant investment in infrastructure, meaning that coverage of basic infrastructure and services in Somali cities is generally inadequate. The decrepit road infrastructure in Somalia not only prevents the delivery of humanitarian aid, it also presents a major constraint on the population's access to vital social services as well as a significant obstacle to the political integration of the country's territories.

Urban infrastructure and urban resilience challenges. Somalia is faced with two critical challenges of creating sustainable internal peace and constructing a path for shared economic growth and prosperity. Among other national priorities, there are substantial infrastructure needs in support of ongoing recovery and reconstruction efforts. Of the 21,933 km of roads in the country[1], it is estimated that only 2,860 km are paved (13 percent), with the majority (83 percent) being un-graveled dirt roads. Somali cities, which are currently characterized by poor road infrastructure, with consequently negative impacts on health and welfare of citizens as well as the economy, urgently need urban regeneration for resilience.

This is especially evident when one looks at the specter of increasing urbanization and the issue of increasing number of internally displaced persons eking out a living in the cities. The cities are characterized by extreme levels of poverty. Nearly 8 in 10 Somalis are estimated to live in conditions of severe poverty with incidence being highest among the displaced. Poverty is widespread, with 77 percent of the population living in poverty. Moreover, Somalia suffers from acute unemployment and underemployment. According to the ILO, 54 percent of the active population (age 15-64) in Somalia is unemployed.

The focus on improving the state of urban infrastructure is in line with national priorities and regional trends. There is an uncharacteristically higher level of urbanization in Somalia. It is for this very fact that Somalia's National Development Plan (2017-2019) calls for priority to be given to "roads serving main cities, towns and settlements."

Somalia Urban Investment Planning Project and Somalia Urban Resilience Project. The World Bank has been supporting the Federal Government of Somalia (FGS) with funding from the Somalia Multi-Partner Fund (MPF) to implement various projects. The Somali Urban Investment Planning Project (SUIPP), a project to prepare a follow-on urban investment

[1] Federal Government of Somalia – Somalia National Development Plan, 2017-2019; accessed at http://extwprlegs1.fao.org/docs/pdf/som169866.pdf on July 1, 2019

project (the Somali Urban Resilience Project, or SURP, has been ongoing since early 2016. The SUIPP original financing targeted Garowe, Mogadishu and Hargeisa, before expanding to Kismayo and Baidoa in 2019. The SUIPP supports the establishment and capacity building of Project Implementation Units (PIUs), institutional assessments of municipalities, and the undertaking of feasibility studies, engineering designs and preparation of bidding and safeguard documents for priority infrastructure investments.

Somalia Urban Resilience Project II. The second phase of the SURP is now being prepared through additional resources from the MPF (US$62 million) as well as the International Development Association (IDA) (US$50 million). SURP II will scale-up investments in Mogadishu and Garowe and also expand support to infrastructure investments in Kismayo in Jubbaland and Baidoa in South-West State, in addition to the previously supported cities of Mogadishu and Garowe. SURP II has a tentative project budget of US$112 million (US$ 62 million from the MPF and US$ 50 million from IDA). The four cities were selected based on their political, economic, and security relevance as well as their vulnerability (concentration of IDPs and urban population growth) relevance.

Development objectives. The Project Development Objective (PDO) of SURP II is "to strengthen public service delivery capacity of local governments and increase access to urban infrastructure in selected areas." The project consists of four components, as indicated below.

- *Component 1: Urban Infrastructure and Services.* This component has two sub-components:
  - Sub-component 1.1: *Support for Urban Infrastructure and Services*
  - Sub-component 1.2: *Investment in Urban Infrastructure and Services*
- *Component 2: Institutional Strengthening and Analytics.* This component also has three sub-components, fashioned as "Technical Assistance" or TA:
  - TA on Displacement and Durable Solutions related to developing sustainable solutions for the displaced living in SURP II target municipalities and mitigating forced eviction.
  - TA on Operation and Maintenance (O&M) of Urban Infrastructure and Services, focusing on on existing roads and drainage, as well as supporting institutional and financial assessment of existing municipal O&M arrangements
  - TA on Subnational Infrastructure and Service Delivery, which facilitate cross learning and dialogue on key urban management issues.
- *Component 3: Project Management*, and
- *Component 4: Contingent Emergency Response.*

Environment and Social Management Framework. This document presents the Environmental and Social Management Framework (ESMF) for the proposed SURP II. The main objective of this document is to develop options for the implementation of the ESMF to be used for the environmental and social screening and assessment of infrastructure project components to be funded within the framework of the proposed SURP II. The ESMF ensures that the project activities scheduled for implementation are compliant with the relevant requirements of national[2] and state-level[3] policies, regulations and legislations as well as the World Bank Environment and Social Standards.

This ESMF sets out the principles, rules, guidelines and procedure to assess the environmental and social impacts of SURP II sub-projects. This ESMF, therefore, applies to those activities that will be financed by SURP II, and Associated Facilities that a supported beneficiary may be involved in the context of SURP II[4]. This ESMF also highlights the appropriate World Bank's Environment and Social Standards and relevant existing Somalia environmental and social relations laws which the proposed SURP II sub-projects have to conform to.

The ESMF also contains an overview of the baseline environmental conditions in the four municipalities identified for support under SURP II, identifies and characterizes potential environmental and social risks and impacts that might arise out of sub-projects' implementation and proposes mitigation and enhancement measures. This ESMF will, therefore, be the basis for the preparation of the site-specific Environment and Social Management Plans (ESMPs) or Environmental and Social Impact Assessment studies (ESIAs) during project implementation phase.

Project Environmental and Social Baseline. It is not clear at the time of developing this ESMF as to the infrastructure investments that will be supported under SURP II interventions. The list of infrastructure investments to be supported under SURP II have not been finalized but all investments would be selected by interfacing the top-down citywide technical assessment with a bottom-up participatory decision-making process. Thus, while the list of exact infrastructure investments to be supported have not yet been finalized, based on the preliminary consultations with the government of Somalia and findings of urban assessments

[2] Federal Government of Somalia

[3] The respective policies of the states of Jubbaland, Puntland, and South-West State, as well as Benadir Regional Administration

[4] As per ESS1, the term "Associated Facilities" in this context means facilities or activities that are not funded as part of the SURP II and are: (a) directly and significantly related to SURP II; and (b) carried out, or planned to be carried out, contemporaneously with SURP II; and (c) necessary for SURP II to be viable and would not have been constructed, expanded or conducted if SURP II did not exist.

undertaken in Kismayo, Baidoa, Garowe and Mogadishu as well as the Drainage Assessment and Road network study undertaken for Mogadishu, priority investments are likely to be

- Existing primary and secondary urban roads and a bridge;
- drainage;
- pedestrian walkways;
- streetlighting; and
- bridges

Policy, Legal and Institutional Frameworks. The key legal instrument for management of environmental affairs in Somalia is the Constitution, especially Article 25 ("Environment"), Article 43 ("Land"), Article 44 ("Natural Resources") and Article 45 ("Environment").

Article 25 of the Constitution states that "[every Somali] has the right to an environment that is not harmful to their health and well-being, and to be protected from pollution and harmful materials." The article proceeds to declare that "[every Somali] 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 (in Chapter 3 – Land, Property and Environment) exhorts "all people in … Somalia" to "participate in the development, execution, management, conservation and protection of the natural resources and environment." Article 43, on its part, provides guidelines on environmental and social safeguards that can be observed. However, there are no standing environmental and/or social safeguards in terms of legislated and or/drafted regulations.

Environmental and Social Risk Rating. The physical components of the SURP II are civil works related to the development and upgrading interventions on key community and urban roads in four Somali cities – Mogadishu, Garowe, Kismayo and Baidoa. The impact of the civil works is expected to be small-scale, localized and reversible. There are, therefore, no significant or irreversible adverse environmental issues anticipated from the activities to be financed under SURP II.

The engineering capacity of the client is relatively strong with regards to construction of small-scale civil works. However, the client's ability to apply World Bank environmental and social standard is limited, as this is the first ESF being implemented in Somalia. Although the Mogadishu PIU has good experience applying the previous Bank safeguards, this is the first World Bank infrastructure project in South- West State and Jubbaland. Lastly, the country risks are significant due to political and security considerations and GBV risks; the ability for the World Bank to supervise environmental and social risk management is limited.

Considering above, the overall environmental and social risk rating is "**High**" under World Bank's Environmental and Social Risk Classification system (ESRC).

Applicable Environmental and Social Standards. Due to the dearth of applicable environmental and social laws and regulations at national level in Somalia, the project will apply the World Bank Environment and Social Framework, and will, therefore, not rely on Somalia's E&S framework. Eight ESSs will be relevant to SURP II project activities:

- ESS 1 ("Assessment and Management of Environmental and Social Risks and Impacts")
- ESS 2 ("Labour and Working Conditions")
- ESS 3 ("Resource Efficiency and Pollution Prevention and Management")
- ESS 4 ("Community Health and Safety")
- ESS 5 ("Land Acquisition, Restrictions on Land Use and Involuntary Resettlement")
- ESS6 ("Biodiversity and Sustainable Management of Living Natural Resources")
- ESS 8 ("Cultural Heritage")
- ESS 10 ("Stakeholder Engagement and Information Disclosure")

Therefore, the project will comply with the ESSs, where potential risks and impacts are anticipated. Where possible, the project will put premium on implementing alternative measures to avoid, minimize, mitigate, manage or compensate adverse environmental impacts. Avoidance measures will be prioritized over mitigatory or compensatory measures. Additionally, the project will enhance positive impacts in project selection, location, planning, design, implementation and management.

Potential Environmental and Social Benefits of the Project. The SURP II sub-projects as proposed will have climate change ancillary benefits, as the paving of currently unsealed urban surfaces in the four cities will contribute to climate change adaptation. Once upgraded, the newly surfaced urban roads will contribute to mitigating traffic congestion, and reducing air pollution substances such as SOx and NOx, as well as CO_2, which are major contributors of climate change.

Expected environmental benefits: The project will have environmental benefits, including:

- improved air quality due to reduced traffic congestion, fuel consumption and dust entrainment through better roads;
- reduced vehicle and accident hazards;
- improved pedestrian traffic safety because of better road quality and solar- powered street lights and signage; and
- reduced road flooding and reduced roadside erosion through drainage improvement.

Expected social benefits: The social benefits of the project include:

- improved community accessibility to schools, health care centres, and other livelihood activities through better roads;
- improved security and safety through improved walkways and street lights;
- employment opportunities for the community through construction and maintenance of the municipal infrastructure; and
- positive economic impact on livelihood and the businesses through better accessibility and improved security.

Potential Environmental and Social Impacts and Risks of the Project. There are environmental risks and impacts that are anticipated with the implementation of SURP II project activities. Because of the nature and relatively moderate scale of the works in urban environment under the project, the environmental impacts will be minor, temporary, and confined to the area immediately surrounding the construction. Further, because of the scale of proposed investments within each municipality, cumulative effects of the project are likely to be insignificant. Anticipated environmental risks and impacts include:

- localized environmental risks,
- community and worker's health and safety risks associated with construction/rehabilitation work.

These risks include the normal impacts of civil works (i.e. dust, noise, erosion, surface water sedimentation, traffic interruptions, temporarily impeded pedestrian access, pollution from construction wastes), as well as waste from worker campsites (where established). These short-term impacts can be prevented or mitigated with standard operating procedures and good construction management practices. While some municipalities may contain some land with inherent environmental sensitivity, sensitive areas will be excluded through the subproject selection process.

Social risks and impacts envisaged. While the scale and nature of the civil works are limited, some social risks and impacts may be significant. These include:

- land acquisition and physical and economic displacement;
- potential risks related to labour and working conditions, such as OHS, child labour, labour disputes, security risks and labour influx including sexual harassment, exploitation, and abuse, and other forms of gender-based violence (GBV);
- potential exclusion of disadvantaged and vulnerable groups from project benefits; and
- potential risks of increased social tension in the community (for example, dispute over resettlement or dissatisfaction of districts that have not been chosen for the subproject location).

Mitigation measures will entail the implementation of Resettlement Action Plans (RAP) and labour management procedures (LMP); adoption of mitigation measures for labour influx and GBV risks (such as tapping of local workforce, use of code of conduct, collaboration with local communities and GBV-related service providers); inclusion of disadvantaged and vulnerable groups in project-related job opportunities; and effective stakeholder engagement, including inclusive and transparent consultation process and functional grievance redress mechanisms (GRM).

Monitoring and Mitigation Measures. In order to address the aforementioned potential adverse impacts, an environmental and social screening process has been proposed under this ESMF, and will be applied in such a way as to ensure that potential negative impacts of the project are prevented or mitigated appropriately, and positive impacts are enhanced.

Project Implementation Arrangements. The proposed SURP II will build on the engagement developed through the SUIPP and SURP I. Through these earlier projects, PIUs have been set up in Mogadishu and Garowe and are currently being established in Kismayo and Baidoa. These PIUs are staffed with a Project Coordinator, Finance Specialist, Procurement Specialist, Environment/Social Safeguard Specialists, Engineers and Monitoring and Evaluation Specialists and all positions were competitively recruited. These staff are also being provided capacity building support in financial management, procurement and environmental and social safeguards and engineering. These are 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.

Building on the capacity development in SUIPP/SURP, SURP II will be implemented in a decentralized manner through municipalities. The PIUs located in municipalities would have project management responsibility, coordinating overall project implementation, ensuring the timely availability of fund transfer to contractors, implementing the relevant safeguard instruments and ensuring continuous community outreach and consultation, maintaining project accounts and producing financial reports, monitoring and evaluating program implementation and impacts, developing and implementing the GRM and reporting results to various stakeholders.

SURP II will also support the establishment of a Project Coordination Unit (PCU) at the federal Ministry of Public Works. The PCU would be responsible for providing oversight of the project, liaising with the Ministry of Finance/EAFS and supporting project monitoring. The federal Ministry of Public Works PCU will include a minimum a Project Coordinator, a Financial Management Specialist, Environment/Social Safeguard Specialist and other technical specialists as deemed relevant.

An institutional assessment of the federal MoPW was carried out under the SUIPP in 2016 but this assessment will need to be updated given the numerous changes in leadership and high turnover of staff in the Ministry. MoPW is currently benefiting from capacity building support through the African Development Bank funded project – the Somalia Strengthening Institutions for Public Works Project (SSIPWP). The SSIPWP is the centerpiece initiative for building the capacity of the Federal MoPW and the more recently established State-level Ministries and aims to develop more effective, efficient, accountable and inclusive federal and state ministries that deliver much needed infrastructure and services to all Somalis. The SSIPWP also targets Somali youth by creating youth employment opportunities.

In States where deemed necessary such as Jubbaland and South West State, a State level inter-ministerial committee will continue to support the SURP II. These committees were set up under the SUIPP but the composition can be revisited to ensure inclusivity and the roles and responsibilities of these committees can be further clarified.

Table 1 below shows the implementing agencies (municipalities) in SURP II and identifies the ministries, departments and agencies (MDAs) which comprise the membership of the respective PIUs.

Table 1: Implementation arrangements (implementing partners and PIU membership) for the SURP II project

Territory	City	Main implementing partner	Other line ministries represented in the PIU
Benadir	Mogadishu	Benadir Regional Administration/Mogadishu Municipality	PIUs to fill in
Puntland	Garowe	Municipality of Garowe	PIUs to fill in
South-West State	Baidoa	Municipality of Baidoa	PIUs to fill in
Jubbaland	Kismayo	Municipality of Kismayo	PIUs to fill in

Public Consultations and Disclosure. The World Bank Environment and Social Standards require public consultation with affected groups and other stakeholders about the project environmental and social impacts, with a view of taking their suggestions and inputs into account. The details of stakeholder engagement are presented in the Stakeholder Engagement

Framework (SEF). World Bank's Safeguards team have also closely engaged with state-level technical personnel, in Mogadishu and in Nairobi, with a briefing and discussion sessions with proposed SURP II focal persons from Mogadishu, Garowe and Baidoa, in May and June 2019. Follow-on sessions were held in Nairobi at the end of May 2019.

During project preparation, public consultations were conducted on environmental and social frameworks of the project (ESMF, RPF, SEF and LMP) in Mogadishu and Garowe in July and August 2019, involving a broad range of stakeholders including district residents, project-affected persons, CSOs, civil servants, UN agencies, project workers and vulnerable/marginalized groups. Issues discussed include general project perception of the community, employment opportunities, occupational and community health and safety, environment, resettlement and compensation, urban planning and IDPs, stakeholder engagement and GRM. The updated frameworks and its Somali translation will be disclosed before appraisal in country and on WB website.

Cost Implications of the ESMF. Low capacity within the implementing municipal teams in Baidoa and Kismayo risks undermining the ability of recipient-executed project activities to be rolled out in a timely and effective manner. To mitigate this risk, the project will contribute to developing capabilities of municipalities in the two aforementioned states to oversee the execution and delivery of project's technical interventions in urban infrastructure development and management. Technical capacities in the ministries are limited; as such, an engineering and supervision consultant (UNOPS) has been supporting them to administer the bulk of project activities on behalf of the local governments.

The ESMF has assessed the implementing agencies capacities and has proposed measures to enhance safeguards capacity to improve environmental and social performance during project implementation; this will include safeguards training for PIU. The indicative budget proposed to implement the ESMF over the life of the SURP II project is USD 257,600 (*see table 9*).

Grievance Redress Mechanism. The project implementing agencies have set up a project-specific Grievance Redress Mechanism (GRM) for people to report concerns or complaints, if they feel unfairly treated or are affected by any of the subprojects. The mechanism will amongst other things:

- provide information about project implementation;
- provide a forum for resolving grievances and disputes at the lowest level;
- resolve disputes relatively quickly before they escalate to an unmanageable level;
- facilitate effective communication between the project and affected persons;
- win the trust and confidence of project beneficiaries and stakeholders and create productive relationships between the parties.

The mechanism is envisaged to be at multiple levels and will address such complaints, including logging, tracking, and resolving grievances promptly during and after the

implementation of SURP II. The implementing agencies will have dedicated person or team to be responsible for setting up and maintaining the GRM that allows the general public in the project area and affected communities or individuals to file complaints and to receive responses in a timely manner. The system will also record and consolidate complaints and their follow-up. This system will be designed for handling complaints perceived to be generated by the project or its personnel. It may also include disagreements about compensation and other related matters. More details of the GRM are presented in the SEF.

1 INTRODUCTION AND PROJECT CONTEXT

1.1 PROJECT CONTEXT

Situated in the Horn of Africa, Somalia is bordered by Ethiopia to the west, Djibouti to the northwest, the Gulf of Aden to the north, the Guardafui Channel and Somali Sea to the east, and Kenya to the southwest. With a total land area of 637,657 km2 and situated between 2°S and 12°N latitudes and 41° and 52°E longitudes, Somalia has the longest coastline on Africa's mainland. The country's terrain consists mainly of plateaus, plains and highlands. Climatically, hot conditions prevail year-round, with periodic monsoon winds and irregular rainfall.

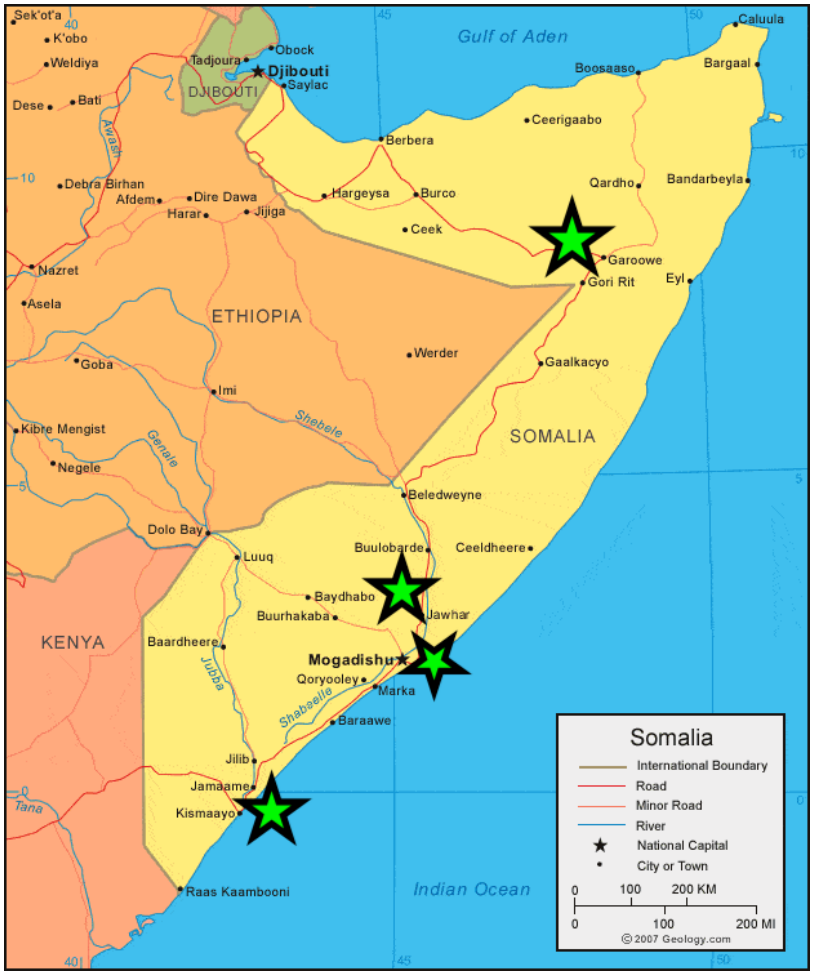

Figure 1: Map of Somalia, showing the four cities targeted for urban regeneration under SURP II

As Somalia emerges from nearly three decades of civil strife, the national road transport infrastructure, which is vital for the country's economic and social development, is in very poor condition. Due to a lack of railway infrastructure and limited coastal shipping, road

transport is the principal mode of internal transport. Decades of conflict and fragility has prevented any significant investment in infrastructure, meaning that coverage of basic infrastructure and services in Somali cities is generally inadequate. The decrepit road infrastructure in Somalia not only prevents the delivery of humanitarian aid, it also presents a major constraint on the population's access to vital social services as well as a significant obstacle to the political integration of the country's territories.

Somalia is faced with two critical challenges of creating sustainable internal peace and constructing a path for shared economic growth and prosperity. Among other national priorities, there are substantial infrastructure needs in support of ongoing recovery and reconstruction efforts. Of the 21,933 km of roads in the country, it is estimated that only 2,860 km are paved (13 percent), with the majority (83 percent) being un-gravelled dirt roads. Somali cities, which are currently characterized by poor road infrastructure, with consequently negative impacts on health and welfare of citizens as well as the economy, need urban regeneration for resilience.

Somalia's National Development Plan (2017-2019) calls for priority to be given to "roads serving main cities, towns and settlements." The World Bank has been supporting the Federal Government of Somalia (FGS) with funding from the Somalia Multi-Partner Fund (MPF) to implement various projects. The Somali Urban Investment Planning Project (SUIPP), a project to prepare a follow-on urban investment project (the Somali Urban Resilience Project, or SURP, has been ongoing since early 2016. The SUIPP original financing targeted Garowe, Hargeisa and Mogadishu.

1.2 THE SURP II PROJECT

SURP II has a tentative project budget of US$112 million (US$ 62 million from the MPF and US$ 50 million from IDA). The four cities were selected based on their political, economic, and security relevance as well as their vulnerability (concentration of IDPs and urban population growth) relevance.

SURP II will strengthen urban resilience by:

- providing capacity building support to municipalities and strengthening government systems at the sub-national level by channelling funds on-budget;
- financing prioritized urban infrastructure investments in cities;
- generating short-term income generation opportunities for the vulnerable such as women, urban poor, IDPs and returnees; and
- strengthening institutions for urban development at the municipal level.

The theory of change underlying the proposed project interventions is that supporting municipal government capacity and delivering much needed urban infrastructure would support the Government's efforts to demonstrate visible and tangible improvements in the

lives of its citizens, critical for strengthening the legitimacy of the government and sustaining social and political stability in the country.

1.3 PROJECT DEVELOPMENT OBJECTIVE AND COMPONENTS

Project Development Objective. The Project Development Objective (PDO) of SURP II is "to strengthen public service delivery capacity at the local government level and increase access to urban infrastructure in selected areas."

The project consists of four components, as indicated below.

Component 1: Urban Infrastructure and Services. This component has two sub-components:

- *Sub-component 1.1*: **Support for Urban Infrastructure and Services**. The financing will be focused on technical studies, engineering designs and bidding documents for priority investments; environment and social due diligence work; and institutional assessments of implementing agencies. The preparation of these studies would be contracted out by the respective municipalities/district governments and a competitive procurement process would be followed.
- Sub-component 1.2: **Investment in Urban Infrastructure and Services**. Subject to a funding criterion established by the Bank, this sub-component will finance costs associated with the implementation and supervision of infrastructure investments in cities where the necessary implementation readiness criteria are met. The investments include critical investments that fill the existing urban infrastructure gaps in the four target cities, and strategic investments that contribute to urban resilience.

Component 2: Institutional Strengthening and Analytics. This component also has three sub-components, fashioned as "Technical Assistance" or TA:

- TA on **Displacement and Durable Solutions** related to developing sustainable solutions for the displaced living in SURP II target municipalities and mitigating forced eviction.
- TA on **Operation and Maintenance (O&M) of Urban Infrastructure and Services**, focusing on existing roads and drainage, as well as supporting institutional and financial assessment of existing municipal O&M arrangements
- TA on **Subnational Infrastructure and Service Delivery**, which facilitate cross learning and dialogue on key urban management issues.

Component 3: Project Management. This component will finance both the overall project management costs of the project as well as capacity building of project and municipal staff who will implement and manage the project. Specifically, this component will finance costs related to staffing of a Project Coordination Unit (PCU) located in a federal level line ministry

such as the Ministry of Public Works as well as the PIUs at the municipal level in all target cities.

Component 4: Contingent Emergency Response. This contingent emergency response component (CERC) would be included under the project in accordance with the World Bank Policy on 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 categories at the time 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.

1.4 PROJECT BENEFICIARIES

The project envisages both direct and indirect beneficiaries. Trade has always been a major backbone of Somalia's economy since ancient times, and forms the major source of income for many Somalis. A lot of trading activities are undertaken in the four carefully selected municipalities, but they are hobbled by a decrepit transport infrastructure set-up. A capable road network is crucial in this regard as it links the economic centres within cities and town and connects them with administrative centres. Roads connect people and promote economic growth.

The infrastructure investments supported under SURP II are likely to result in significant benefits to the population within in Mogadishu, Garowe, Kismayo and Baidoa. The infrastructure investments will be selected using the criteria outlined by the World Bank in partnership with the municipalities, but are likely to be urban primary and secondary roads and a bridge, drainage, pedestrian walkways and streetlighting. In addition to infrastructure, the project will be supporting the capacities of municipalities in overall project management to help build a platform for future service delivery in cities. Various segments of the population will benefit, including women and youths. Women stand to particularly benefit directly from the time savings delivered by improved access to centres or institutions rendering social services.

2 SCOPE AND METHODOLOGY OF THE ESMF

2.1 PURPOSE AND SCOPE OF THE ESMF

Because specific projects ("sub-projects") to be implemented using SURP II funds will only be identified during implementation of the project, an Environmental and Social Management Framework (ESMF) has been developed. The purpose of the ESMF is to ensure that the sub-project executed under the SURP II project address and identify measures to avoid and minimize environmental and social impacts, as much as possible. Where these cannot be avoided, the impacts are adequately identified, assessed and necessary mitigation measures designed and implemented following relevant, existing Somali environmental and social legislation and the World Bank's Environmental and Social Standards.

2.2 ESMF JUSTIFICATION

The Environmental and Social Management Framework (ESMF) clarifies appropriate environmental and social standards, processes, and mitigation principles, organizational arrangements and design criteria to be applied to subprojects, which are to be prepared during project implementation by the respective PIUs in the project municipalities in Somalia and private sector companies (such as construction companies) participating in the SURP II project.

The PIUs will use and refer to this ESMF during implementation of the project. Where appropriate, Environmental and Social Management Plans (ESMPs) will be prepared during project implementation following guidelines in the ESMF. It remains the responsibility of the Safeguards focal person with the four PIUs to ensure that the necessary mitigation plans are developed and adhered to by the beneficiaries.

The specific objectives of this ESMF are:

- To ensure that the implementation of the project, for which the exact locations of the sub-project sites are not definitively identified at this stage, will be carried out in an environmentally and socially sustainable manner.
- To provide information about scope of adverse environmental and social risks and impacts expected during sub-project planning, construction and operation; describe the approach to mitigation and monitoring actions to be taken; and cost implications.
- To clarify the roles and responsibilities of PIUs and private sector companies and operators and other stakeholders with regard to environmental and social due diligence, management of risks and impacts, and monitoring.
- To provide the project implementers with an environmental and social screening process and risk management procedures that will enable them to identify, assess and

mitigate potential environmental and social impacts of subproject activities, including through the preparation of a site-specific Environmental and Social Impact Assessments (ESIA) and/or Environmental and Social Management Plans (ESMP) where applicable.

2.3 ESMF PRINCIPLE

This ESMF will guide the PIUs in Mogadishu, Garowe, Baidoa and Kismayo in implementing the project in line with World Bank ESF and Somalia government environmental and social management standards.

2.4 METHODOLOGY

The ESMF was prepared through literature review and stakeholder discussions. With close coordination with the World Bank, PIUs in Mogadishu, Garowe, Baidoa and Kismayo and United Nations Office for Project Services (UNOPS) undertook a review of relevant national legislation, policies, and guidelines, including the World Bank ESSs related to this Project.

During project preparation, public consultations were conducted on environmental and social frameworks of the project (ESMF, RPF, SEF and LMP) in Mogadishu and Garowe in July and August 2019, involving a broad range of stakeholders including district residents, project-affected persons, CSOs, civil servants, UN agencies, project workers and vulnerable/marginalized groups. Issues discussed include general project perception of the community, employment opportunities, occupational and community health and safety, environment, resettlement and compensation, urban planning and IDPs, stakeholder engagement and GRM. The updated frameworks and its Somali translation will be disclosed before appraisal in country and on WB website. For Kismayo and Baidoa where the PIUs are still not adequately staffed and trained as of project appraisal, the consultations to validate the environmental and social frameworks will be conducted as soon as the PIUs in these municipalities are adequately trained on the ESF. This commitment is included as part of the ESCP. More details on the stakeholder engagement (including consultations conducted for SURP II project preparations and GRM) and information disclosure are presented in the SEF for the SURP II.

3 POLICY, LEGISLATIVE AND INSTITUTIONAL FRAMEWORKS

3.1 OVERVIEW

This section describes the existing policy, legislative and institutional framework that will be important for consideration in the design, implementation, monitoring and evaluation of the SURP II project. The section begins with the existing framework in the Federal Government of Somalia, before focusing on the respective systems in Puntland, South-West State and Jubbaland states and the Benadir Regional Administration.

It is important to note that at the time of the development of this ESMF South-West State and Jubbaland did not have any significant legislative frameworks governing the management of the environment and natural resources sector. It was therefore difficult to include the respective policy, legislative and institutional frameworks for these states in this ESMF. The World Bank has undertaken a systemic study in South-West State and Jubbaland that has identified existing gaps in environmental regulations, policies and legislation, with a view of capacity enhancement for the two states.

3.2 SOMALIA NATIONAL LAWS, POLICIES AND LEGISLATIONS

Constitution of the Republic of Somalia. The key legal instrument for management of environmental affairs in Somalia is the Constitution, especially Article 25 ("Environment"), Article 43 ("Land"), Article 44 ("Natural Resources") and Article 45 ("Environment"). Article 25 of the Constitution states that "[every Somali] has the right to an environment that is not harmful to their health and well-being, and to be protected from pollution and harmful materials." The article proceeds to declare that "[every Somali] 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 (in Chapter 3 – "Land, Property and Environment") exhorts "all people in … Somalia" to "participate in the development, execution, management, conservation and protection of the natural resources and environment." Article 43, on its part, provides guidelines on environmental and social safeguards that can be observed. However, there are no standing environmental and/or social safeguards in terms of legislated and or drafted regulations. The Article also affirms that the federal government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem.

3.3 LAWS AND REGULATIONS IN THE STATES IN SOMALIA

Puntland. The National Environmental Policy (2015) provides the overall guiding policies relating to the management of the environment and natural resources. This policy allows a rationalisation of administrative regulations and policies to eliminate deficiencies or inconsistencies with other previous policies. The policy promotes the use of appropriate

environmental assessment instruments such as the EIA and Strategic Environmental Assessment.

The legislative and policy environment in Puntland is still adjudged as weak, although there has been much greater progress here as compared to Somalia. Puntland's Constitution envisages, in Article 96, the importance and protection of the environment. Among the key features include combating deforestation, soil erosion and pollution. The Constitution forbids exportation of charcoal trading in endangered plant and animal species. Prohibition has been placed too on creating of unsustainable urban-like sprawls in rural settings.

The existing policies, laws and regulations in Puntland relevant to SURP II project implementation include the following:

- Environmental Policy (2014) approved by the Cabinet and Parliament;
- Environmental Management Act (2016) approved by the Cabinet;
- Puntland Rangeland Management Policy 2nd Edition (2016-2025);
- Puntland Waste Management Policy (2016);
- EIA Act and Regulation (2016) approved by Cabinet and Parliament;
- Puntland Climate Change Strategy (2016); and
- Ministry of Environment and Climate Change Strategic Plan (2016-2020).

The environmental licensing process in Puntland is relatively straightforward. Ministries control the licensing procedures.

- The Ministry of Environment and Climate Change (Puntland) has the powers to grant any of the licenses sought.
- Every license shall be subject to such conditions as may be specified therein during the issuance stage.
- The minister (or any person authorized by him or her) may at any time cancel or suspend any license granted by or on behalf of the minister:
- Grounds for cancellation include suspicions of infringement of any of the conditions upon which said license has been granted
- The minister may, at any time, also vary the conditions of any such license.
- Any person aggrieved by any order under this clause may appeal to the minister, whose decision shall be final.

3.4 INTUITIONAL CAPACITY FOR ENVIRONMENTAL MANAGEMENT

Somalia Federal Government. The Somali government has introduced changes in the institutional set-up dealing with environmental issues in the country. A Directorate of the Environment ("DoE") has been formed within the Office of the Prime Minister. The Directorate is mandated to draft the national environmental policies, regulations and legislations including establishing of the Environmental Quality Standards, Sectoral Environmental Assessments (SEAs), Environment Impact Assessments (EIAs) and Environmental Audits (EAs), among others. However, necessary laws or legislations have not yet been formulated, and no commissions or authorities have been established as of July 2019.

The DoE, part of the Office of the Prime Minister (OPM), takes the lead in the formulation of environmental policies and laws, coordinates stakeholder consultation and partnerships with state agencies, local councils, civil society and private sector entities (Somalia State of the Environment Report, 2019). The Directorate is also the operational focal point for multilateral environmental agreements and funds, such as the Global Environment Facility (GEF), Green Climate Fund (GCF) etc. It is also tasked with conducting Sectoral Environmental Assessments (SEAs), Environment Impact Assessments (EIAs) and Environmental Audits (EAs).

Jubbaland and South-West State. Jubbaland and South-West states have fully-fledged Ministry of Environment and Tourism (MoE&T), which manage environmental related issues within the respective states. The MoE&T has developed and passed environmental and social impact assessment (ESIA) regulations, which are meant to govern environmental matters, including licensing of projects roads.

State ministries in charge of environment and tourism are the principal institutions to be consulted before, during and after the implementation of all interventions under SURP II, in so far as they relate to possible environmental and social risks and impact. These ministries are mandated to supervise and co-ordinate all matters relating to the environment. They will review and approve the safeguard documents such as ESIA and RAP during SUIPP works implementation in Kismayo and Baidoa.

The Jubbaland Land Authority and the South West Land Authority are responsible for land adjudication matters. These agencies, through their respective departments, will play key role in SURP II works implementation in Kismayo and Baidoa. They will be engaged in the review of land acquisition drawings, matters related to road surveys, registration of land transactions such as land for road reserves and acquisitions, etc.

Municipalities of Kismayo and Baidoa. Among the local governments' key mandate are to plan and construct the road network to meet the needs of the people and to maintain the

road network to facilitate an efficient transport services within the municipality area. For SURP II works, both municipalities will be the implementing agencies as well.

Puntland. The Ministry of Environment, Agriculture and Climate Change (MoEACC) deals with management of environment and natural resources in Puntland. The ministry collaborates with the Humanitarian Affairs and Disaster Management Agency (HADMA) in the development of climate change, early warning and drought resilience strategies. It also collaborates in the identification and mapping of Puntland disaster prone zones.

The MoAECC has responsibility for climate change mitigation and adaptation strategies, and has a five–year plan (2017-2021). Puntland's disaster management authority, HADMA, is not directly involved in environment-related activities, but has a key role in disaster preparedness, management and mitigation. The municipal council of Garowe has overall responsibility for roads within its administrative jurisdiction.

The Ministry of Planning and International Cooperation (MoPIC) has a three-year development plan (2017-2019) covering livestock, agriculture, social services and the environment. The plan was approved in 2016 by the Puntland Cabinet and is being supported by the UNDP Somali Project Watch Brief.

Benadir Regional Administration (BRA). BRA is a local government entity, 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. 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 administrative head is also the governor of the region as well as mayor of the city.

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 are disputed by the Ministry of Public Works, Reconstruction and Housing.

3.5 INTERNATIONAL CONVENTIONS AND AGREEMENTS SIGNED OR RATIFIED BY SOMALIA

There are a number of international treaties, agreements and conventions that had been signed or ratified by Somalia. These conventions and agreements are aimed at halting environmental degradation and improving the sustainable use of natural resources, and are relevant for the SURP II project in one way or the other. Among the important international conventions related to natural resource use and management that Somalia is a signatory to, include:

- Convention on International Trade in Endangered Species of Wild Fauna and Flora

- Convention on the Conservation of Migratory Species of Wild Animals;
- Regional Convention for the Conservation of the Red Sea and the Gulf of Aden Environment;
- Protocol concerning Regional cooperation in Combating Pollution by Oil and other Harmful Substances in Cases of Emergency;
- UN Convention on the Law of the Sea; and
- Protocol concerning Co-operation on Combating Marine Pollution in cases of Emergency in the Eastern African region.
- Convention for the protection, Management and Development of the Marine and Coastal Environment of the Eastern African Region (Nairobi Convention).
- Six ILO fundamental conventions (See the LMP for more details)

3.6 WORLD BANK ENVIRONMENT AND SOCIAL STANDARDS

Relevant Environmental and Social Standards. The World Bank's Environmental and Social Standards seeks to avoid, minimize, else mitigate the adverse effects of development projects it is financing through the IPF modality. The compliance with these Standards is required among others, to assure that the project is eligible for World Bank support. Due to the dearth of applicable environmental and social laws and regulations, the project will apply the World Bank Environment and Social Framework. Eight ESSs will be relevant to SURP II project activities:

- ESS 1 ("Assessment and Management of Environmental and Social Risks and Impacts")
- ESS 2 ("Labour and Working Conditions")
- ESS 3 ("Resource Efficiency and Pollution Prevention and Management")
- ESS 4 ("Community Health and Safety")
- ESS 5 ("Land Acquisition, Restrictions on Land Use and Involuntary Resettlement")
- ESS6 ("Biodiversity and Sustainable Management of Living Natural Resources")
- ESS 8 ("Cultural Heritage")
- ESS 10 ("Stakeholder Engagement and Information Disclosure")

More details on the ESSs and how they apply to the SURP II project are enumerated in Table 2 below

Table 2: Summary of applicable World Bank Environment and Social Standards (ESSs)[5]

Standard	Relevant?	Explanation on application
ESS 1 *Assessment and Management of Environmental and Social Risks and Impacts*	Yes	This Standard sets out Somalia's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of SURP II in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs). As a result, this ESMF has been prepared, in conjunction with other, appropriate safeguards documentation, including: ■ Resettlement Planning Framework ■ Labour Management Procedures ■ Stakeholder Engagement Framework
ESS2 *Labour and Working Conditions*	Yes	While the exact labour use (including the number of project workers, their characteristics and timing of workforce mobilization) is to be determined during the implementation of each subproject, the project workers engaged or employed will include ■ **direct workers** (such as consultants hired in PIUs, PCU and the engineering and supervision consultants); ■ **contracted workers** (such as skilled permanent staff of the primary contractor (construction company), skilled workers engaged by sub-contractors (such as heavy machine operators), and unskilled community members engaged by the contractor (such as host community members and IDPs including female workers); and ■ **primary supply workers** (such as workers to produce essential construction materials such as aggregates and concrete blocks on an ongoing basis for the project.).

[5] More details at http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources

		Other stakeholders working in connection with the project include **government civil servants** (such as federal, state and municipal officers and district police officers). The civil servants will remain subject to the terms and conditions of their existing public sector employment. *Potential labour risks and mitigations*: Potential risks related to labour and working conditions include ■ **OHS risks** (such as moving equipment and heavy machines, noise, vibration, welding, chemical hazard, working environment temperature, working at height and safety and hygiene in worker camps); ■ Child labour; ■ Labour influx; ■ Labour disputes over terms and conditions of employment; ■ Discrimination and exclusion of vulnerable/disadvantaged groups; ■ Security risks (workers exposure to attacks). Labour Management Procedures (LMP) has been prepared for SURP II, with relevant mitigation measures that will be incorporated into procurement documents.
ESS3 *Resource Efficiency and Pollution Prevention and Management*	Yes	Because of the nature and relatively moderate scale of the works, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction. These risks related to ESS3 include the normal impacts of civil works (i.e. dust, noise, erosion, surface water sedimentation, pollution from construction wastes and water use), as well as waste from worker campsites. To address these short-term impacts, this ESMF includes standard operating procedures and good construction management practices, include those proposed in WB Environmental and Health Safety Guidelines (EHSGs).
ESS4 *Community Health and Safety*	Yes	Community health and safety impacts will be minor, temporary, and confined to the area immediately surrounding the construction.

		Anticipated risks and impacts include community health and safety risks associated with construction/rehabilitation work, such as traffic safety, community exposure to diseases, hazardous materials and emergency preparedness. To address these short-term impacts, the ESMF includes standard operating procedures and good construction management practices, include those proposed in WB EHSGs. To address potential risks associated with the security personnel to be hired by contractors, the ESMF includes mitigation measures in compliance with ESS4. Assessment of project- related sexual exploitation and abuse (SEA)/GBV will be conducted during project preparation. Given the assessment of GBV risks under SURP I, and given the context of pervasive insecurity, it is advised that the project adopt a robust approach to address potential GBV risks. Relevant mitigation measures to address these risks (e.g., integrating Codes of Conduct with SEA/GBV-related protections, community consultations and mapping activities to identify potential service providers, and establishment of GRM with procedures and channels to enable safe, confidential and ethical reporting of GBV incidents) are articulated in this ESMF. Additional considerations include development of a GBV Action Plan and elaboration of provisions for Third Party Monitoring. The project will also look to include provision of capacity building and training of relevant stakeholders including contractors and project workers, in addition to capacity building for government partners. GBV risks should be monitored throughout project implementation through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement.
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Yes	The resettlement impacts of each sub-project are likely to be moderate due to the limited size and nature of the individual physical works. The physical displacement will be minimized and duly compensated. The economic displacement will largely relate to mobile vendors or temporary impact during the construction, which will be also minimized. More details are presented in the RPF.

ESS6 *Biodiversity Conservation and Sustainable Management of Living Natural Resources*	Yes	While a few locations in a few municipalities may contain some land with inherent environmental sensitivity relevant to ESS6, the subproject screening process in the ESMF will exclude such sensitive areas. The ESMF includes specific measures to avoid or minimize negative impact on critical or protected areas if the sub-project screening process does not otherwise exclude these areas.
ESS7 *Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities*	No	ESS7 is not relevant to the project, as the people in the project area are not considered as Indigenous Peoples as defined under ESS7.
ESS8 *Cultural Heritage*	Yes	There is the potential for chance find of cultural or archaeological significance during construction and the existence of some historic buildings around the secondary road investments that could potentially be impacted from the construction. The ESMF has been updated to comply with ESS8, and the subproject-specific ESMPs will address these issues through the inclusion of chance find procedures. More details are available in Annex 6 of this ESMF
ESS9 *Financial Intermediaries*	No	Not relevant to this project
ESS10 *Stakeholder Engagement and Information Disclosure*	Yes	Key stakeholders include project-affected communities, host communities, federal, state and municipal authorities, religious and local leaders, civil society organizations (CSOs), and other development partners. As discussed in ESS1, the potential disadvantaged and vulnerable groups for SURP II stakeholder engagement process include:

		■ IDPs, refugees and returnees; ■ Poor households (such as female headed, widows, elderly, orphans, persons living with severe illness); ■ Persons with disabilities; ■ Illiterate community members; and ■ Minority clans. SURP II will take differentiated measures to include such groups into stakeholder engagement activities, such as through focus group/individual meetings, mediation by community support groups, accessible consultation venues, simply written materials or graphics or provision of free municipal transport. More details on the consultation, information disclosure and the GRM are presented in the SEF.

The project will comply with the ESSs, where potential risks and impacts are anticipated. Where possible, the project will put premium on implementing alternative measures to avoid, minimize, mitigate, manage or compensate adverse environmental impacts. Avoidance measures will be prioritized over mitigatory or compensatory measures consistent with the mitigation hierarchy. Additionally, the project will enhance positive impacts in project selection, location, planning, design, implementation and management

3.7 WORLD BANK GROUP EHS GUIDELINES

WBG has guidelines for Environment, Health and Safety (EHS) that serve as useful references for general issues as well as sector-specific activities. Projects financed by the World Bank Group are expected to comply with this guideline as required by the policies and the standards. The EHS guidelines are mainly on occupational health and safety, community health and safety as well as on construction and decommissioning. It contains guidelines cross cutting on environmental (waste management, ambient air quality, noise and water pollution), occupational health and safety issues among others, applicable to all the industry sectors.

3.8 GAP ANALYSIS

The activities in the SURP II project need to comply with both existing Somali laws and regulations and World Bank Environment and Social Standards. This sub-section compares the national public sector environmental management rules, regulations and standards to World Bank's Standards. The main objective of this assessment is to help implement this ESMF more effectively at the Federal and State levels in Somalia through an understanding of existing gaps.

Table 3 below summarizes a comparison focusing on the World Bank policies relevant to the project and gaps identified in existing Somali laws and regulations.

Table 3: GAP analysis for Environmental and Social Standards – SURP II project, Somalia, July 2019

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
ESS1 ("Assessment and Management of Environmental and Social Risks and Impacts")				
EIA instruments	Range of instruments to satisfy the Bank include EIAs, regional or sectoral EAs, EMP, etc.	Instruments for environmental assessment have not been not delineated at Federal level, and are absent in Jubbaland and South-West State	EIAs not incorporated into Federal laws, and are weakly captured at State level in only Puntland Missing in South-West State and Jubbaland	ESMF to guide the borrower World Bank currently also undertaking environmental management capacity assessment study targeting South-West State and Jubbaland
Environmental impact screening	Screening procedures developed for projects involving sub-projects, as is the case in SURP II		Screening procedures are absent in two States (South-West State and Jubbaland)	ESMF to guide the borrower
Public consultations	The Bank requires the Borrower to initiate consultations with project-affected persons and other	Procedures for public consultations not explicitly stated	Procedures for public consultations not explicitly stated	SEF to guide the borrower

	interested parties including civil society			
Monitoring of environmental data	Bank requires regular monitoring of environmental data to evaluate the success of mitigation and to foster corrective measures at the earliest possible juncture	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental data	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental data	ESMF to guide the borrower
Institutional arrangement	Requirement by the Bank for specific description of institutional arrangement and implementation schedule for monitoring and mitigation measures	Directorate of the Environment in the Office of the Prime Minister Benadir Regional Administration The city governments of Garowe and Baidoa	Directorate of the Environment in the Office of the Prime Minister may be responsible for coordinating institutional responses under this ESMF, but the institutional information is not available and its remit is unknown, as is its technical capacities	Respective PIUs to work with the respective ministries and agencies responsible for management of environmental matters as the focal points for administration of this ESMF
ESS2 ("Labour and Working Conditions")				
Management of different types of project workers	The Bank puts emphasis on the identification and characterization of	Labour Code of Somalia (Law Number 65, adopted in 1972) is the specific labor law	The Labour Code is broadly consistent with the ESS2, while there is a significant gap in the	ESMF and the Labour Management

	different types of workers (project workers, direct workers, contracted workers, community workers, primary supply workers) to manage different types of labor risks.	governing all aspects of labor and working conditions, which covers the contract of employment, terms and condition, remuneration, and occupational health and safety, trade unions and labor authorities. The provisions of the Labour Code apply to all employers and employees in all project municipalities. The Labour Code is applicable to all project workers of SURP II.	enforcement aspect of the legislation. More detailed are presented in LMP.	Procedures (LMP) to guide the borrower
ESS3 ("Resource Efficiency and Pollution Prevention and Management")				
Pollution prevention and management	This ESS requires the Borrower to undertake a health and safety risk assessment of any existing pollution which may affect communities, workers and the environment		There are no supporting legislative frameworks for pollution prevention and management	ESMF to guide the borrower on pollution prevention and management
Management of hazardous wastes	The bank requires the Borrower to undertake specific measures to manage both		There are no approved hazardous waste disposal sites in Somalia	ESMF to guide the borrower on the management of both

	hazardous and non-hazardous wastes. Specific emphasis is given in this ESS with respect to transportation and disposal, obtain chain of custody documentation to the final destination. Approved disposal sites are required for this ESS.			hazardous and non-hazardous wastes
ESS4 ("Community Health and Safety")				
Traffic and road safety	This ESS requires the Borrower to identify, evaluate and monitor the potential traffic and road safety risks to workers, affected communities and road users throughout the project life cycle and, where appropriate, will develop measures and plans to address them.		No provisions in existing national laws on road and traffic safety	ESMF to guide the borrower on road traffic safety
Security personnel	This ESS postulates that when the	District police provide security	While the security protocols guiding	SURP II project to be guided by the

	Borrower retains security personnel to safeguard workers and property, it will assess risks posed by these security arrangements to those within and outside the project site. The Borrower will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat.	services to SURP I and II. The civil servants in Somalia are governed by Provisional Constitutions and Civil Service Law (Law Number 11). However, there are no security protocols guiding their deployment, and there is possibility of violence meted out on civilians or workers or even the possibility of rent-seeking.	their deployment and use of force are broadly unknown, the project will coordinate with the law enforcement authorities in each municipality to manage associate risks.	ESMF and relevant provisions of ESS4 on the deployment of security personnel to project sites, especially in Mogadishu, Baidoa and Kismayo where security risks are deemed substantial. In addition, the respective PIUs will closely follow the requirements for deployment of security personnel in SURP II project sites as enumerated in the Good Practice Note on "Assessing and Managing the Risks and Impacts of the Use of Security Personnel. Security assessments and plans will be done at municipality level.[6]

[6] For more details on this Good Practice Note, please refer to the World Bank's publication, available at http://documents.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English.pdf

ESS5 ("Land Acquisition, Restrictions on Land Use and Involuntary Resettlement")				
Physical and economic displacement	This ESS covers the involuntary taking of land, resulting in loss of shelter or loss of assets: a hierarchy has been provided that seeks to minimize losses to affected persons. It forbids forced evictions.	Laws governing land resources (including ownership) are either absent at both FGS and FMS levels.	Therefore, there are no functional national or state policies guiding involuntary resettlement of persons affected by the SURP II project. More details are presented in RPF.	RPF to guide the borrower.
ESS8 ("Cultural Heritage")				
Management of risks on tangible and intangible cultural heritage, including legal protection to cultural heritage sites	This ESS requires the Borrower to manage risks on tangible and intangible cultural heritage, including identification of the presence of all listed legally protected cultural heritage areas affected by the project		There are no explicit laws or regulations delineating sites as places of cultural importance	ESMF to guide the borrower

4 PROJECT BIOPHYSICAL AND SOCIOECONOMIC SETTING

4.1 OVERVIEW

This section focuses on the existing biophysical and socio-economic environments in the four proposed project-supported states/regions: South-West State, Puntland, Jubbaland and Benadir Regional Administration. Physio-geographically, Somalia is a country of limited contrasts, but for the SURP II project, this ESMF will treat the four project sub-regions as three relatively distinct continuities:

- Puntland (arid agroecology)
- Jubbaland and South-West State (semiarid agroecology)
- Mogadishu (coastal marine agroecology)

Ecologically-sensitive sub-regions within the regions will be identified where possible.

4.2 INTRODUCTION

The proposed project will be implemented in a context of ecologically fragile environments, in some places (such as Puntland) characterized by a high number of arid-adapted flora (including the deciduous species of Acacia and Commiphora in addition to Euphorbia and Aloe variants forming understory) and fauna (such as the Dorcas gazelle, Beisa oryx, gerenuk, the Somali wild ass *Equus africanus somaliensis* and the Somali warthog, *Phacochoerus aethiopicus delamarei*) species, many of them endemic. Some of these species used to thrive in the country's national parks and game reserves, which were relatively well protected in the reign of former central government. Following the collapse of the former regime, the parks have all but disappeared, and it was extremely difficult to gather any information on their current state, actual boundaries, management, etc.

Many of the species aforementioned are categorized as Critically Endangered (CR), Endangered (EN) or Vulnerable (VU) in international conventions and agreements, such as the World Conservation Union's Red List of Threatened Animals[7]. Considering the urban environment settings of the proposed SURP II subprojects, it is unlikely that SURP II interventions will affect such species. As a precaution, it will be critically important for the PIUs to engage with communities, contractors, civil society and other government MDAs to ensure that the project does not affect existing biodiversity.

4.3 CLIMATE

All the four proposed project states share similar characteristics, climate-wise. There is generally warm and arid climate across most parts of the four states, though precipitation and the wind can be highly variable in places at certain times of the year (on account of

[7] See http://www.animalinfo.org/country/somalia.htm

proximity to the equator). Typically, the Somali climate is typically hot and semiarid to arid, with two annual rainy seasons (*Gu*', which spans from April to June, and *Deyr*, which takes place from October to November). There are variations in spatial distributions of rainfall, with about 500 mm recorded annually in the northern highlands and between 300 and 500 mm in the southern regions. The coastal plains register only between 50 and 150 mm.

Annual potential evapotranspiration (PET) is high, exceeding 2,000 mm in the northern basins and can be as high as 3,000 mm in the Gulf of Aden. Over the dry period, the vegetation is sustained mainly through the shallow aquifers found along the dry riverbeds (*tog* or *wadis*) across the country. Fertile flood plains and continuous recharge from the Juba and Shabelle Rivers, both originating from Ethiopian highlands, also provide sustained development growth along the riverine areas.

4.4 ECOSYSTEMS

Somalia's environmental complement, especially the vegetation resources, offers contrasting experiences, and this is due to the spatial and temporal precipitation distributions. There are four main eco-regions in Somalia, whose distribution is determined by the spatial and temporal distribution of the two annual rainfall seasons:

- The dominant xeric grasslands and shrub-lands (accounting for 74 percent of the country's landmass),
- Somali montane xeric woodlands (14 percent),
- East African mangroves (11 percent), and
- coastal forest mosaic (11 percent).

Farms in the south-central region, urban centres and other settlements account for the remaining 1 percent of dry landmass.

South West State. This State, which forms part of the larger south-central and southwestern ecosystem of the country, is characterized by large swathes of grasslands, scattered farmlands, and are home to the two main river systems in the country (Jubba and Shebelle). The soils are best described as poorly drained clayey soils with high salt content. Well-watered (compared to the other three regions slated for support under SURP II) and covering administratively the most arable portions of the country, the state is home to rich pasturage and features semiarid savannah grasslands, open woodlands, and thickets that include frequently abundant underlying grasses. Vulnerable groups in this State include the Somali Bantu community, which relies on small-scale irrigated agriculture on the banks of the two main river systems for their livelihoods. SURP II will not be implemented where such groups or their assets or resources are present.

Puntland: Puntland's ecological characteristics are underlined by broken mountain terrain, shallow plateau valleys and usually dry watercourses known locally as the Ogo. The region

is also characterised by generally high temperatures ranging between 25°C (in the Sool and Sanaag regions) and >35°C in the northern coastal regions (e.g. Bossaso), with the hottest temperatures recorded between July and September. In this region, the arid climate means that all rivers are ephemeral and flashy, with water flowing for only a few hours to days after rainfall events. There are no river gauging stations in these rivers.

The high plateaus of northern Somalia are comprised mainly of low formations of arid scrublands and scattered grass clumps crossed by broad, shallow and generally dry watercourses. These watercourses have water for short periods during rainy seasons, and are thus able to provide short-term fodder (usually no more than 5 to 6 months in a year) for transhumant livestock populations.

In Puntland, an important ecological feature, is the long and broad Nugaal Valley, with its network of extensive and intermittent seasonal watercourses that collect runoff from the periodic and erratically low rainfall. There are large herds of small stock (shoats – sheep and goats) belonging to nomadic pastoralists who eke out a living in this marginal land. Productivity in this region is hobbled by not only precipitation challenges but also by the high prevailing temperatures.

With increase in elevation and rainfall in the mountain ranges of the north-western Puntland, the vegetation becomes denser and includes aloes, woodlands, and remnants of juniper forests and candelabra euphorbia. The area receives the highest rainfall in the whole of Somalia. The fauna and flora of the habitat are relatively stable due to low human encroachment thanks to the distant escarpments and plateau areas though hunting larger animals have reduced their population. Strict endemic reptiles of the area include the spalerosophis and Leptotyphlops snakes and the pseuderemias lizard. The Somali Pigeon and thrush are found in this area. The gazelles are more widely distributed than other mammals but suffer from over-hunting and overgrazing of the livestock.

Important to note too that in this fragile ecosystem, *Boswellia* and *commiphora* trees are sources, respectively, of frankincense and myrrh, production of which Somalia (and Puntland) has been renowned for since ancient times. However, vegetation in large parts of the northern coastal plains is denuded: thus, large areas are almost bereft of vegetation even in the best of times, due to inappropriate land uses, including extensive production of unregulated charcoal.

4.5 SURP II CITIES

Kismayo. Kismayo is a coastal city situated about 500 km to the south west of Mogadishu, near the mouth of Jubba River. Kismayo is the third largest city in Somalia and the capital of both the Lower Jubba region and the Jubaland state. Kismayo has a hot semi-arid climate. Weather is hot year-round, with seasonal monsoon winds and irregular rainfall with recurring droughts. Mean daily temperatures range between 25° C and 30° C with the daily maximum temperatures reaching up to 35° C. February to April is usually the hottest months. The Southwest Monsoons, begin in April and last until July producing significant fresh water and allowing lush vegetation to grow. Average annual rainfall is about 500 mm and April to July monsoon accounts for about 80% of the annual rainfall. The monsoon is followed by the dry season.

Figure 2: Map of Kismayo city, capital of Jubbaland State, Somalia

Kismayo is the market centre and commercial hub autonomous Jubbaland Region complemented by the sea port. In addition to the port operations, charcoal production, fishing, seasonal farming and retail business are the main economic activities of Kismayo and the surroundings. Employments with international organizations and remittances from the diaspora are also notable input to the local economy. Due to increased stability in the area, other areas of economic activities are starting to pick up: they include construction of dwellings and business premises, growing retail sector, telecommunication services, hotels and restaurants, etc.

Following collapse of central government in 1991, land in Kismayo is managed through the *xeer* system, where the clans allocate land to their members. Insecurity of land tenure and inaccessibility to formal systems of land registrations are contributing to land conflicts. IDP settlements are among the most affected, as they are often owned by one or more private landowners, which easily leads to forced evictions. Land issues are complex in Kismayo due to the presence of large number of clans and the constant influx of IDPs and returnees.

Baidoa. Situated approximately 250 km northwest of Mogadishu, Baidoa is the capital of the Bay region. In 2014 the city became the capital of the South-West State of Somalia and later became a Federal Member State. Baidoa has a hot semi-arid climate as similar to Kismayo and weather is hot year-round. The mean daily temperatures range between 25° C and 30° C with the daily maximum temperatures reaching above 40° C during majority of months. Baidoa experiences two short rainy seasons per year during April/May and October/November. The average annual rainfall is about 500 mm, with just four months recording about 80 percent of the annual rainfall. The remaining eight months are mostly dry.

There has been no urban planning in Baidoa, and the only areas formally developed were along the main axes within the city, where the majority of the public buildings are located. Land use in the study area consists mainly of grazing and wood collection for fuel and building. IDP camps are also a notable feature of land use in Baidoa.

The issues of land disputes remain challenging, similar to the Kismayo situation, given the land ownership interests among clans and sub-clans, and pastoralist and sedentary communities, IDPs, returnees and host community in and around Baidoa. IDP settlements are among the most affected, as they are often owned by one or more private landowners, which easily leads to forced evictions and the violation of other housing, land and property rights of displacement-affected people.

Figure 3: Map of Baidoa city, in South-West State of Somalia

Garowe. The climate in Garowe is arid temperatures range between 14ºC and 34ºC. The highest average rainfall is recorded during the month of May at 51mm. Mean annual rainfall is about 108 mm. Garowe is however a highly urbanized area with residential, industrial and commercial zones. Historical records indicate that Garowe and much of north-eastern Somalia were an integral part of the Majeerteen Sultanate that is ruled by *Boqor* Osman Mahamud, cousin of Sultan Yusuf Ali Kenadid of the Sultanate of Hobyo. Within this municipality, where the roads and bridge sub-projects will be constructed, there are no sensitive environments that may be adversely affected by the planned construction works.

Figure 4: Map of Garowe city, capital of Puntland, Somalia

Mogadishu. Mogadishu is Somalia's capital and the largest city in Somalia. It is located on the south western coast by the Indian Ocean. Latitude and longitude coordinates for Mogadishu are 4°2' N and 22°45'E. The city has an area of 91 km² and an estimated population of between 1.5 million to 2.5 million.

Mogadishu's climate, which is described as hot semi-arid climate (noted as BSh in the Köppen climate classification system), is characterized by four seasons alternating between two rainy and two dry seasons. The main rainy season, gu, lasts from April to June. This is followed by a dry season, xagaa, which lasts from July to September. The second rainy season, deyr, lasts from October to December and is followed by the second dry season, jilaal, lasting from January to March. Mogadishu receives an average of 466 mm of rain per year. The average annual temperature in Mogadishu is 27°C.

Figure 5: Map of Mogadishu city, Republic of the Republic of Somalia

Located in the coastal lowlands, Mogadishu has a variable terrain climbing upwards from the sea level up to nearly 40 meters in some areas then descending down to nearly 20 meters above sea level. The unevenness of the terrain has posed a great challenge in addressing the city's drainage. Benadir region has "a variety of rocks including limestone, sandstone, marls and clay, sand, coral limestone, and sandstones, as well as a wide system of coastal sand dunes with the soil closest to the shore being pure loose marine sand".

The main soil type found in Mogadishu is arenosol formed through weathering and associated with shifting sand dunes locally referred to as *bacaad*. On windy days, sand is blown from sand dunes and it accumulates on the buildings and roads. The area is recharged through direct rainfall. The high permeability level of the soil (due to grain size distribution and low organic matter content), along with low water depths, makes Mogadishu vulnerable to ground water contamination.

Mogadishu has sparse and widely spaced vegetation cover, due to the strongly leached arenosols that have low nutrient content and very tight nutrient cycling between vegetation and surface soils. The main genera around this sub-tropical area is acacia which is wide-spread on the sand dunes around the city. Other species include *Tamarindus indica* (for which the city is named) and *Azadirachta indica*, which are both widely grown in and around the city.

4.6 SOCIO-ECONOMIC ENVIRONMENT

Geography, landmass and population. Population numbers are difficult to come by. Somalia, with a landmass of about 627,340 km^2, has a population estimated to be 15,294,151[8]. Estimates show that, out of the total population, 4,968,526 people in 2018 are living in urban centres. This accounts for a relatively highly urbanised society (standing at ~33 percent). The population density in Somalia is estimated at 24 persons per km^2, one of the lowest in East Africa. The median age in Somalia is estimated to be 16.6 years. The population's livelihoods are connected to either livestock husbandry, smallholder dryland agriculture, itinerant commerce or remittances from diaspora. Somalia is reportedly the world's fourth-most remittance dependent country, which makes up about 20-50 percent of local economy[9].

The United Nations Population Fund (*formerly the United Nations Fund for Population Activities*) estimated that in 2014[10] the total population of Somalia was 11,800,833, which was broken down to 1,830,073 for Puntland, 508,180 for Somaliland and 6,462,580 for the rest of Somalia.

Poverty in Somalia. The United Nations classifies Somalia as a least developed country. The socio-economic situation of the country is described as "very poor" in the National Development Plan (2017-2019)[11], with approximately 69 percent of Somalis reportedly living below the poverty line. Poverty cuts across sectors, location, group and gender, and its forms and causes vary. An understanding of Somalia's geography, recent trends in its economy and consequences of the civil strife is important to determining the nature and extent of its poverty. There is more stability in the northern regions (Somaliland and Puntland), and consequently less poverty. Poverty in Somalia is more pronounced in the IDP camps, where is it estimated to be 88 percent, followed by rural areas with 75 percent and urban areas with 67 percent.

[8] These estimates are based on information from http://www.worldometers.info/world-population/somalia-population/

[9] See https://en.wikipedia.org/wiki/Economy_of_Somalia

[10] UNFPA Population Estimates Survey of Somalia 2014

[11] See http://extwprlegs1.fao.org/docs/pdf/som169866.pdf for a copy of the Plan

Agriculture, livestock and livelihoods. Only about 10 percent of Somalia's land can be described as arable and suitable for crop production. Somalia's agricultural sector, which accounts for 65 percent of the GDP and employs 45 percent of the active workforce (Somalia Agriculture Report, 2018), relies on the state of health of the country's natural capital (vegetation and water resources). It is worth nothing that the livestock sub-sector alone accounts for between 80 to 90 percent of agricultural GDP, and contributes about US$2.4 billion (or about 40 percent of total GDP) and more than 90 percent of export earnings (*ibid*), and grows 6 percent annually.

According to the Somalia Agriculture Report (2018), total agricultural exports have climbed every year since the late 2000s, to a peak in 2015 of $634 million, more than five times the value before the civil war. The Somalia Supply and Market Outlook Assessment report by FEWSN (2017) identifies the country's four main staple foods are maize, sorghum, rice, and wheat. While maize and sorghum are grown locally, rice and wheat are almost entirely imported.

Gender. UNDP Somalia reports that Somalia has one of the highest gender inequalities in the world, at 0.776, which ranks fourth in the world. The country has an extremely high maternal mortality, rape, female genital mutilation and child marriage rates, and violence and SEA/GBV 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. While in Somaliland and Puntland women's rights are ostensibly protected in their respective constitutions, however implementation of these provisions is lagging behind.

Women make up 57 percent of the workforce in agriculture and pastoralism (both of which constitute nearly 70 percent of the local economy). The number of women working in government departments and agencies in Somalia is estimated at just 19 percent of the workforce. The situation is also dire in the education sector, where only 36 percent of pupils in the upper primary education are girls. Gender disparity is higher in upper grades due to economic constraints and early marriage.

In Somalia, the women are significantly involved in trading and commerce, from micro-enterprises to large-scale businesses. While the women butcher and sell small ruminants (goat and sheep), they however make up most of the fruits and vegetables vendors. The women are also engaged in the sale of local imported goods (e.g., rice, sugar, wheat, sorghum, etc.).

The project should make a positive impact for women transhumant nomads and smallholder farmers in terms of increasing access to more and better-quality water and agricultural goods and services (extension, improved seeds, quality germplasm, among others). The project implementing teams should make deliberate efforts to ensure that women and girls are represented in community investment planning and in the governance structures of the road infrastructure constructed under SURP I and II. Environmental and social risks mitigation should also ensure women's needs are addressed.

4.7 CULTURAL PROPERTY

Culture, or "*dhaqan*" in Somali, is a fundamental pillar of the social fabric of Somalis, and has evolved as an amalgamation of traditions developed independently since the proto-Somali era. The culture has also been enriched tremendously through interaction with neighboring and far away civilizations, including other parts of Africa, the Arabian Peninsula, and the Indian subcontinent. However, there has been loss of cultural, tangible and intangible, heritage due to looting and civil conflict. In addition, there has been reported losses of cultural heritage and property due to development projects in Somalia.[12]

The implementation of SURP II sub-projects will be concentrated on the four main cities of Mogadishu, Garowe, Kismayo and Baidoa. While the typical roads selected for upgrades might not intersect directly with places of cultural interest, deliberate efforts to preserve cultural artefacts, cultural heritage and distinct sub-national identities should be maintained. In particular, PIUs should ensure that places of cultural and religious significance such as graveyards of ancient revered personalities (where this is the case) and mosques are respected and not affected by construction works negatively.

Annex 6 ("Protection of Cultural Property") in this ESMF details the procedures that are to be followed in the fulfilment of management and preservation on cultural property and artefacts.

[12] See, for instance, UNESCO's 2013 report on "Scoping study on the culture sector in Somalia", available at http://www.unesco.org/new/fileadmin/MULTIMEDIA/FIELD/Nairobi/images/SOMCLTRPT.pdf

5 CONSULTATIONS AND PUBLIC DISCLOSURE

5.1 INTRODUCTION

The World Bank Environment and Social Standard 10 "Stakeholder Engagement and Information Disclosure") recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. This Standard requires public consultation with relevant stakeholders (potential project beneficiaries, affected groups and local non-governmental organizations (NGOs) about the project environmental/social impacts and take their view into account.

The Garowe and Mogadishu PIUs have already established their respective grievance redress mechanisms (GRMs) that allow general public in the project area, affected communities or individuals to file complaints and to receive responses in a timely manner. Similar set-ups will be inaugurated for the other two cities (Kismayo and Baidoa). The system will also record and consolidate complaints and their follow-up. This system will, be designed for handling complaints perceived to be generated by the project or its personnel. It may also include disagreements about compensation and other related matters.

5.2 CONSULTATIONS DURING PROJECT PREPARATION

During project preparation, public consultations were conducted on environmental and social frameworks of the project (ESMF, RPF, SEF and LMP) in Mogadishu and Garowe in July and August 2019, involving a broad range of stakeholders including district residents, project-affected persons, CSOs, civil servants, UN agencies, project workers and vulnerable/marginalized groups. Issues discussed include general project perception of the community, employment opportunities, occupational and community health and safety, environment, resettlement and compensation, urban planning and IDPs, stakeholder engagement and GRM.

Table 4: Feedback from consultations and their incorporation into ESMF

Feedback received	Incorporation into ESMF
General community outlook: Road construction will have immeasurable advantages but also disadvantages, which can always be minimised through implementation of mitigation measures. Potential benefits noted as: ■ Social cohesion and integration ■ Increased land value ■ Prosperity in businesses and livelihoods ■ Improved security including street lighting ■ Improved accessibility ■ Creating investing opportunities ■ Employment, especially for IDPs and returnees in Midnimo and Medino camps in Kismayo ■ Women's accessibility to town to offer casual labour such as house helps and laundry services ■ Reduction in fares incurred by women especially as they access public transport	Agreed Incorporated into the beneficial aspects of the project

Community concerns: ■ False promises to put mitigation measures in place – they request that a policy should be developed and shared with the local authority so that the contractor complies ■ Consideration of safety in design to minimize accidents as the roads in the area are curvy ■ Possibility of increased accidents especially involving children and requested safety measures to be put in place including bus stops, roundabouts and zebra crossing points ■ No proper waste water management in place, septic tanks done at household levels	This has been addressed through the use of legislative and institutional frameworks where they exist, and by the robust presence on the ground of the PIUs; road designs have been developed to incorporate safety concerns, which are also highlighted in the mitigation plans of this ESMF Noted as being outside scope
Recommendations made: ■ Giving largest share of unskilled labour to the IDPs and returnees during construction ■ Hiring of labour should give priority local community as opposed to importing construction workers from elsewhere so as to prevent conflicts ■ Involvement of the communities and the existing local authority in every step if possible, for an easy transition and resolution of land dispute cases ■ Involuntary relocation – prefer compensation in case this occurs	Incorporated into the impact mitigation and monitoring plans

The updated frameworks and its Somali translation will be disclosed before appraisal in country and on WB website. For Kismayo and Baidoa where the PIUs are still not adequately staffed and trained as of project appraisal, the consultations to validate the environmental and social frameworks will be conducted as soon as the PIUs in these municipalities are adequately trained on the ESF. This commitment is included as part of the ESCP. More details on the stakeholder engagement (including consultations conducted for SURP II project preparations and GRM) and information disclosure are presented in the SEF for the SURP II.

6 POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS, IMPACTS AND MITIGATION

6.1 INTRODUCTION

This section highlights the environmental and social risks and impacts along with associated mitigation measures for the expected negative environmental and social risks and impacts linked to SURP II's civil works, especially during the construction and operational phases. Based on stakeholder consultations and on account of the fact that the project length is relatively limited, it is envisaged that SURP II will have minor deleterious environmental and social impacts. In addition, the potential positive socio-economic benefits that may be registered as a result of this urban regeneration and renewal project are also described.

This section, therefore, contains a preliminary summary of the impacts that are likely to result from the SURP II project activities as a result of the interaction between the project components and the environmental and social assets of the project-supported communities in the four municipalities. It should be noted that the impacts identified here are preliminary in nature but based on the experience gained under SURP I. More detailed information will be included in the Environment and Social Management Plans.

An Environmental and Social Commitment Plan (ESCP) has been prepared for the SURP II project. The ESCP requires compliance with all provisions of the following environmental and social instruments, which have all been prepared for SURP II;

- This ESMF;
- The Resettlement Policy Framework (RPF);
- The Stakeholder Engagement Framework (SEF); and
- The Labour Management Procedures (LMP);

The ESCP also requires compliances with Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs), Stakeholder Engagement Plans (SEPs) and Labour Management Procedures (LMPs), which will be prepared for subprojects under SURP II.

6.2 ENVIRONMENTAL AND SOCIAL SCREENING FOR SUB-PROJECTS

Screening is the first step in the ESMF preparation process, and the designated Safeguards Specialists assigned into the respective PIUs will coordinate and lead the screening process. The process filters out the SURP II sub-projects that are not eligible for the projects, and classifies only eligible sub-projects on the basis on a set of evaluation criteria. The environment and social risks of the sub-project identified by the screening process, will dictate the need and kind of environmental assessment instrument that had to be performed for each of these eligible sub-projects during the detailed construction phase.

The environmental and social screening conducted as part of the ESMF can provide inputs into the initial identification of potential impacts by the implementation of the proposed project activities, which can be considered as constraints that the urban engineers need to seriously consider in their planning process. The planners may opt to find project alternatives, or amend the design to minimize the adverse effects of the proposed works. When all options are not feasible, then appropriate mitigation measures need to provided, complete with monitoring mechanisms and adequate budget.

All proposed subproject will be subjected to the screening process to understand environmental and social risks and further identify potential sensitive environmental and social receptors likely to be negatively impacted. The process will also identify critical issues that might be triggered by the subproject and would need further detailed investigations during environmental and social assessments. This process will also help in advising what safeguards tools (ESIAs, ESMPs, RAPs etc) will be required for the various subprojects. Most importantly, it will help in re-aligning, re-designing and where not possible dropping out sub-projects that have extreme high risk and the potential to negatively impact on the environment, natural habitat and physical cultural resources forests.

The environmental and social screening would involve:

- reconnaissance of the subproject areas or routes and their surroundings;
- identification of the major subproject activities; and
- preliminary assessment of the impacts of these activities on the ecological, physicochemical and socio-economic environment of the subproject surrounding areas.

Key environmental and social risks identified as crosscutting for the project include labour and OHS risks. The project investments will be considered in the environmental and social assessments. Specific E&S risks for each project component are mainly linked to processes and capacity of key stakeholders for E&S risk management.

A template form for environmental and social screening for SURP II sub-project activities is presented in Annex 2. This will be reviewed and updated as needed during the process. In addition, in Annex 3, this ESMF provides for indicative TORs in case there is a requirement for an Environmental and Social Impact Assessment (ESIA) for large-scale works such as bridge construction. Annex 4 provides TORs which will be useful during the development of city-specific ESMPs prior to the start of construction of sub-projects.

6.3 SAFEGUARDS INSTRUMENTS PREPARATION

Designated Safeguards Specialists working with the PIUs in each of the four cities (and any additional city that may be included later on in the project) will prepare one consolidated Environmental and Social Management Plan (ESMP), in conjunction with one Resettlement Action Plan (RAP) for the subprojects to be implemented in their city of

jurisdiction, covering the priority roads selected for upgrading. The designated Safeguards Specialists will supervise the preparation of the instruments, and this will be done in close consultations with affected parties and other stakeholders in order to obtain wider ownership of the process.

6.4 REVIEW AND APPROVAL OF SAFEGUARDS INSTRUMENTS

Following the development of the safeguards instruments, the designated Safeguards Specialists in each of the four cities will submit their draft ESMPs for the agreed priority roads to the World Bank. World Bank Safeguards team will subject the ESMPs to review, and where require, request the Safeguards Specialists in the respective PIUs to undertake revision of the submitted drafts, prior to obtaining clearance. This will be followed by disclosure of the instruments in the project-supported cities. The executive summaries of the ESMPs will need to be translated into the Somali language prior to disclosure, for easier understanding of in-country stakeholders.

6.5 IMPLEMENTATION, MONITORING AND SUPERVISION OF THE SAFEGUARDS INSTRUMENTS

Following World Bank clearance, the PIUs in general and the designated Safeguards Specialists in particular will work with the appointed contractors as they develop contractor ESMPs (C-ESMPs) for each road. Constant monitoring and supervision will be undertaken in order to ensure that there is compliance with the mitigation measures proposed in the ESMPs for each sub-project. The PIUs will be responsible for implementing measures in ESMPs that are beyond the control of contractors. In addition, subprojects should regularly consult with project affected persons and communities throughout subproject implementation, as necessary, to address safeguards-related issues that affect them.

6.6 ENVIRONMENTAL AND SOCIAL RISKS RATING

Assessment of risk for SURP II subprojects will be determined according to their environmental risk level. The risk level is to be estimated based on the intrinsic environmental and social risk associated with

- the type of intervention to be carried out (e.g., maintenance, expansion, upgrading, new infrastructure), and
- the specific type of infrastructure proposed.

The physical components of the SURP II are civil works related to the development and upgrading interventions on key community and urban roads in four Somali cities – Mogadishu, Garowe, Kismayo and Baidoa. The impact of the civil works is expected to be small-scale, localized and reversible. There are, therefore, no significant or irreversible adverse environmental issues anticipated from the activities to be financed under SURP II.

The engineering capacity of the client is relatively strong with regards to construction of small-scale civil works. However, the client's ability to apply World Bank environmental and social standard is limited, as this is the first ESF being implemented in Somalia. Although the Mogadishu PIU has good experience applying the previous Bank safeguards, this is the first World Bank infrastructure project in South- West State and Jubbaland. Lastly, the country risks are significant due to political and security considerations and GBV risks; the ability for the World Bank to supervise environmental and social risk management is limited.

Considering above, the overall environmental and social risk rating is "**High**" under World Bank's Environmental and Social Risk Classification system (ESRC).

6.7 ENVIRONMENTAL RISKS AND IMPACTS ENVISAGED

There are environmental risks and impacts that are associated with the implementation of SURP II project activities.

Environmental risks and impacts envisaged. Because of the nature and relatively moderate scale of the works in urban environment under the project, the environmental impacts will be minor, temporary, and confined to the area immediately surrounding the construction. Further, because of the scale of proposed investments within each municipality, cumulative effects of the project are likely to be insignificant. Anticipated environmental risks and impacts include:

- localized environmental risks, including the loss of vegetation (including trees), especially in Baidoa and Kismayo, and
- community and workers' health and safety risks associated with construction/rehabilitation work.

Other risks and negative environmental impacts include:

- deleterious impacts of civil works, including dust emissions of particular matter, noise, soil erosion, and surface water sedimentation,
- potentially negative impact of bridge construction on river ecosystem, especially affecting surface water hydrology through compaction of soils, increase in impermeable surfaces, potentially affecting flow regimes of ephemeral rivers (water velocity, depth, depositional patterns, and channel morphology),
- traffic interruptions,
- temporarily impeded pedestrian access,
- pollution from construction wastes,
- solid and other wastes from worker campsites (where established).

These short-term impacts can be prevented or mitigated with standard operating procedures and good construction management practices. While some municipalities may contain some

land with inherent environmental sensitivity, sensitive areas will be excluded through the subproject selection process.

For Baidoa and Kismayo which are, in comparison to Garowe or Mogadishu, relative more vegetated, there is a risk of felling of trees. Tables 4 and 5 below show the possible effects of roadworks in these two cities, showing that more than 630 trees may have to be felled for roadworks on some of the roads selected by the municipalities.

Table 5: Possible impact of roadworks in Kismayo city under SURP II on trees and boreholes

Road no.	**Name of the road**	**No. of trees that may be cut**	**No. of boreholes affected**
Road 01	Caymiska - Airport	66	
Road 02	Majengo - Tawakal Road	5	1
Road 03	Tawakal - Dhagahjabis Road	19	
Road 04	Balad - Ring Road	40	
Road 08	Stadium - via Afmadow Road	6	
Road 09	Siinay - Qaxootiga Rd	10	
Road 10	Tawakal/Dhagahjabi - Ocean Rd	10	1
Road 13	Via Afmadow - Animal market	0	
Road 15	Via Afmadow - Qaxootiga	0	
CBD Roads (05, 06, 07, 11, 12, 14, 16, parts of 04,08)	Airport - Xaaji Jaamac Road Cascaseey - Airport Road Airport - Ombulatoriyo Road Fiyaat - Golol Rd Golo - Farjano School Fish market - Somali Star Mayor's office - Ombulatoriyo	46	
TOTAL		**202**	**2**

Table 6: Possible impact of roadworks in Baidoa under SURP II on trees and boreholes

Road no.	Name of the road	No. of trees that may be cut	No. of boreholes affected
Road 01	Hospital Road	16	2
Road 02	Baidoa Main Road	153	2
Road 03	Sharif Gamay	8	0
Road 04	Unaye Road	66	0
Road 05	30 KA Road	61	2
Road 06	Ali Amhar Road	60	0
Road 07	Hanano2 Road	6	0
Road 08	Mursal Road	60	0
TOTAL		**430**	**6**

6.8 SOCIAL RISKS AND IMPACTS ENVISAGED

While the scale and nature of the civil works are limited, some social risks and impacts may be significant, which include:

- land acquisition and physical and economic displacement;
- potential risks related to labor and working conditions, such as OHS, child labor, labour disputes, security risks and labour influx including sexual harassment, exploitation, and abuse, and other forms of gender-based violence (GBV);
- potential exclusion of disadvantaged and vulnerable groups from project benefits;
- potential risks of increased social tension in the community (for example, dispute over resettlement or dissatisfaction of districts that have not been chosen for the subproject location);
- geographic impacts: conversion and diversification of land use, urban sprawl, gentrification, enhanced transportation and rural accessibility, physical splintering
- health and social wellbeing impacts: death of workers, death of community members, GBV, uncertainty, annoyance, and dissatisfaction;
- quality of living environment impacts: perceived quality of the living environment, actual quality of living environment, disruption of daily living practices, aesthetic quality, availability of housing facilities, adequacy of social infrastructure, perception of personal safety and fear of crime, crime and violence;
- economic impacts and materials and well-being impacts: access to public goods, access to government and other social services, income both cash and inking income;

- family and community impacts: alterations in family structure, changes in sexual relations, family violence and GBV, Sexual Exploitation and Abuse (relationship between community members and project workers), disruption of social networks, changed demographic structure of the community, social differentiation and inequity, social tension and violence.

6.9 MONITORING AND MITIGATION MEASURES

In order to address the aforementioned potential adverse impacts, an environmental and social screening process has been proposed under this ESMF, and will be applied in such a way as to ensure that potential negative impacts of the project are prevented or mitigated appropriately, and positive impacts are enhanced.

Mitigation measures will, among other things, entail

- the implementation of Resettlement Action Plans (RAP) and labour management procedures (LMP);
- adoption of mitigation measures for labour influx and GBV risks (such as tapping of local workforce, use of code of conduct, collaboration with local communities and GBV-related service providers);
- inclusion of disadvantaged and vulnerable groups in project-related job opportunities; and
- effective stakeholder engagement, including inclusive and transparent consultation process and functional grievance redress mechanisms (GRM).

6.10 ENVIRONMENTAL AND SOCIAL BENEFITS

Expected environmental benefits: The project will have environmental benefits, including:

- improved air quality due to reduced traffic congestion, fuel consumption and dust entrainment through better roads;
- reduced vehicle and accident hazards;
- improved pedestrian traffic safety because of better road quality and solar- powered street lights and signage; and
- reduced road flooding and reduced roadside erosion through drainage improvement.

Expected social benefits: The social benefits of the project include:

- improved community accessibility to schools, health care centres, and other livelihood activities through better roads;
- improved security and safety through improved walkways and street lights;
- employment opportunities for the community through construction and maintenance of the municipal infrastructure; and

- positive economic impact on livelihood and the businesses through better accessibility and improved security.

The expected investments and potential development benefits or impacts in this project are outlined in Table 6 below.

Table 7: Envisaged positive impact of the SURP II project

Investments	Benefits
Construction/rehabilitation of secondary roads	- Improved access to markets, services and jobs - Increased mobility within cities and reduced travel time - Reduced traffic volume/congestion - Short term income generating opportunities - Reduced road maintenance costs - Strengthened community groups for the selection of road priorities and managing grievances related to civil works
Construction/rehabilitation of side drainage or drainage systems	- Improved maintenance of roads - Improved sanitation (reduced missing of sewage and storm water) - Reduction in spread of waterborne diseases - Reduced costs during floods (for vacuuming of flood water) - Strengthened community groups for the selection of drainage priorities and managing grievances related to civil works
Construction of pedestrian walkways	- Improved access to markets, services and jobs for pedestrians
Installation of streetlighting	- Improved safety for all residents - Increased mobility for women/vulnerable population - Increased local economic activities
Capacity building of municipalities in the following: - financial management - procurement - engineering - safeguards - operations and maintenance	- Improved coordination of donor supported activities at the municipal level - More transparent procurement processes for civil works, recruitment of consultancies - Improved engineering supervision of civil works - Development of O&M systems in municipalities
Technical Assistance to Municipalities in the provision of 'Durable Solutions' for displaced populations	- Strengthened capacity of municipal departments focusing on displacement issues where applicable - Integration of issues related to displacement in urban planning as a possible spillover - Regular dialogue among communities, landowners, district governments and municipalities on forced evictions/displacement - More structured resettlement based on Standard Operating Procedure - Development of or improved policy documents on displacement for use by municipalities

6.11 CLIMATE CO-BENEFITS OF SURP II

The SURP II sub-projects as proposed will have climate change ancillary benefits, as the paving of currently unsealed urban surfaces in the four cities will contribute to climate change adaptation. Once upgraded, the newly surfaced urban roads will contribute to mitigating traffic congestion, and reducing air pollution substances such as SOx and NOx, as well as CO_2, which are major contributors of climate change. Estimates done for this ESMF show that project implementation of activities may result in benefits estimated at US$97 m, representing 87% climate co-benefits. Table 7 below outlines these benefits.

Table 8: Climate co-benefits computation for SURP II

Component	Sub-component	Climate adaptation	Climate mitigation	Potential Climate Co-benefits (adaptation and mitigation)
Component 1: Urban Infrastructure (US$ 87m)	Sub-Component 1.1: Preparatory Works for Urban Infrastructure (US$ 6m)	Since the project locations are susceptible to high temperature fluctuations and occasional flooding due to torrential rainfall, which is expected to increase in frequency and intensity due to climate change, climate resilience measures have been incorporated in the road design. The new roads are, therefore, designed to climate-resilient standards, incorporating both ■ engineering and structural measures (including surfacing with durable materials, proper alignment of the new roads to avoid vegetative loss, and improved drainage systems to avoid erosion of road materials), and ■ bio-engineering measures (grass planting for slope stabilization wherever possible, indigenous shrub and tree planting by the road verges, vegetated stone pitching)	■ The climate-resilient urban roads are also designed in such a manner that the impact on already fragile biodiversity is minimized. ■ By adopting bio-engineering measures SURP II attempts to maintain the existing biodiversity in the region. ■ The newly-planted vegetation on road verges will act as natural sinks for CO_2, in addition to offering shade and other ecosystem services.	US$3m

		The road designs will limit the effects of flooding, especially in the densely-populated cities such as Mogadishu, as well as extreme temperatures (concerns regarding pavement integrity, e.g., softening, traffic-related rutting, embrittlement or cracking, and migration of liquid asphalt).		
	Sub-Component 1.2. Investment in Urban Infrastructure. (US$ 81m)	For adaptation co-benefits, the narrative needs to be strengthened on this to ensure that it is clear that (i) the roads will be designed to climate resilient standards; and (ii) drainage infrastructure will be designed to climate resilient standards and reduce future flooding likely to be exacerbated by climate change. ■ The SURP II will have climate change ancillary benefits, as the paving of currently unsealed urban surfaces in the four cities will contribute to climate change adaptation. ■ Once upgraded, the newly surfaced urban roads will contribute to mitigating traffic congestion, and reducing air pollution substances such as SOx and NOx, as well as CO_2, which are major contributors of climate change. ■ During the two annual rainy seasons in the four cities (accounting for three months every year), the newly paved	■ By improving the surfacing available for commuting, the project has demonstrable positive impact of mitigating traffic congestion in the four cities, thereby reducing air pollution substances such as SOx and NOx, as well as CO_2 gas emissions, all of which are major contributors of climate change. ■ The construction of pedestrian walkways will significantly contribute to supporting non-motorized urban transport, resulting in reduction of emissions from vehicular traffic, and therefore providing climate mitigation co-benefits. ■ In addition, the construction and use of pedestrian	US$80m

		urban roads will have better resistance to flooding, and will drain the water from the surface more easily, thus reducing the risk of potholes and water stagnation on the road surface. ■ In the dry seasons (which account for a cumulative period of nine months every year, on average), the paved surface will reduce the risk of dust vortexes and its consequences on the population.	walkways is an eligible activity for climate change mitigation. ■ The project also includes energy-efficient street lighting, which has significant climate mitigation co-benefits.	
Component 2: Institutional Strengthening and Analytics. (US$ 10m)	Activity 1: TA on Forced Displacement			US$6m
	Activity 2: TA on Operation and Maintenance (O&M) of Urban Infrastructure	■ Investment in climate-resilient roads takes away the need to invest in maintenance and reconstruction of damaged roads every year, especially in the FCV country context of Somalia. ■ The TA on O&M will build the capacity of the municipalities in urban roads maintenance standards, which will include considerations of climate change impacts. ■ The four municipal governments will have enhanced road and highway maintenance capabilities to respond to climate change and climate variability. ■ The TA will also serve to induct the four municipalities with regards to how timely urban roads operation and maintenance		

		activities can help support reduction in climate change vulnerabilities. ■ For instance, the newly upgraded urban roads can help in better distribution of relief supplies in case of natural disasters in the four cities, a departure from the previous scenarios in these operations would have damaged the road networks and obstructed relief efforts.		
	Activity 3: TA on Subnational Governance and Service Delivery	■ There will be knowledge and experiences sharing between the four city governments on governance and service delivery. ■ The TA will be structured to include the support of facilitation of dialogue on climate change impacts between the city government, in order to achieve climate resilient cities, showing the climate change adaptation benefits.		
Component 3: Project Management (US$ 10m)				US$8m
Component 4: Contingent Emergency Response. (US$ 0m)				0
TOTALS		**87% climate co-benefits estimates**		**US$97m**

6.12 ENVIRONMENTAL IMPACTS MITIGATION AND MONITORING MEASURES PROPOSED

The following section (*see Table 8*) presents the mitigation measures proposed for negative environmental and social risks and impacts anticipated for the SURP II project.

Table 9: Environmental and social impacts mitigation and monitoring plan

Potential negative E&S risks and impacts	Mitigation measure proposed
Possible loss of terrestrial biodiversity during the construction phases (*Component 2*), including loss of natural vegetation (both flora and fauna)	■ Avoid environmentally sensitive areas when scouting for gravel extraction and backfill materials for roadworks ■ Contractors and PIUs to seek advice and clearance from appropriate government agencies on the location of these sensitive environments ■ Minimize removal of existing vegetation within the project site, else restore/rehabilitate areas temporarily cleared of its vegetation ■ Use of appropriate indigenous species (tree/shrub/grass/cover crop) for rehabilitating temporarily disturbed/cleared/denuded areas ■ Minimization of cleared area to only the land needed for the construction of the facilities ■ Minimize clearance/cutting of indigenous and rare tree species ■ Careful site selection avoiding sensitive and/or breeding areas ■ Vegetative regeneration should be included as a condition in contracts for physical works ■ PIUs can adopt back-filled borrow pits and use them as bio-engineering nursery areas for earthworks stabilization and maintenance
Topsoil disturbance and degradation due to the use of heavy machinery during construction phase (*Component 2*)	■ Contractors to file plans for land restoration and backfilling of quarries or any other degraded spot within the landscape ■ Contractors to undertake appropriate river bank stabilization measures such as vegetative or structural measures as may be recommended in the detailed engineering designs

	■ Reversal or mixing of soil profiles should be avoided as much as possible by careful removal, storage and replacement of the soils ■ Need to ensure that communities understand the impact of gravel extraction (from borrow puts and quarries) ■ Contractors should be obliged to develop procedures for individual borrow pits as part of their contract proposals for evaluation by the PIUs ■ Contractors to commit in writing to ensure that development of access roads and extraction of gravel do not diminish soil quality and primary productivity capacity ■ Rehabilitate borrow pits and quarry areas after completion of construction subprojects
Air quality problems, including: (a) increased levels of air pollution caused by the operations of construction vehicles and heavy equipment and (b) increased greenhouse gases emission due to the operations of construction vehicle and equipment	■ Ensure that project and contractor vehicles and other equipment undergo scheduled preventive maintenance for proper exhaust emission ■ Construction truck drivers to observe established speed limits on earthen roads during dry periods ■ Avoid burning of biomass as much as possible and use fire only in situations where this is least environmental damaging
Noise, dust and vibration from construction and maintenance equipment	■ Use of modern, well maintained equipment fitted with noise enclosures ■ Strict controls of timing of activities (e.g., prohibition on night-time working) ■ Observance of seasonal sensitivity (breeding and animal migration seasons)
Inefficient solid waste management during construction, operation and maintenance phases, leading to waste generation hence polluting soils, surface & shallow groundwater, especially during the rainy season	■ Preparation of waste management plan for each waste stream and implementation of the waste hierarchy ■ Prepare and implement a waste management plan subject to the concurrence of the respective PIUs in the four municipalities

	■ The PIUs, working in concert with contractors, to make cost-effective use of redundant borrow pits for waste and spoil disposal (especially where regeneration is adjudged impossible or highly cost-ineffective) ■ Contractors to provide garbage receptacles in strategic places within the construction area, and regularly collect and properly deposit of these wastes in the designated disposal areas ■ As much as practicable, reuse construction spoils that meets construction material specifications ■ When practicable, compost organic and degradable waste in suitable container, and provide this to interested farmers for their crop production
Poor management of occupational health and safety could lead to accidents, injuries and illness, especially among causal labourers hired from the community in the area (*see also OHS measures proposed in the LMP*)	■ Conform to International standards regulations governing roadworks and other infrastructure development ■ Rest and recreational facilities and time should be provided ■ Adherences to comprehensive health and safety and risk management plans and reporting system ■ Availability of First Aid kits at the working sites and camps (including temporary camps) ■ Training of roadwork gangs in First Aid ■ Strict regulation of incidents register ■ Arrange with nearby suitable hospitals or health clinics to treat project staff and workers that are sick or had been victims of accidents in the roadwork sites or camps ■ Contractors to develop an Emergency Response Plan for each SURP II site ■ Orient ambulance drivers and emergency response team on alternative routes, and instruct traffic aides to assist the medical and emergency response teams when necessary

	■ Establish a code of conduct to be followed by all construction supervisors and workers that will include disciplinary action in case of gross violation of the guidelines
Land acquisition and resettlement issues (including physical and economic displacement)	■ Comply with the RPF, including the following: ■ Prepare and implement the RAPs subject to WB approval, for each of the sub-projects with significant resettlement issues ■ Ensure all resettlement issues are resolved prior to the start of construction ■ Require contractors to give preferential hiring to qualified members of project affected households
Potentially negative impact of bridge construction on river ecosystem, especially affecting surface water hydrology through compaction of soils, increase in impermeable surfaces, potentially affecting flow regimes of ephemeral rivers (water velocity, depth, depositional patterns, and channel morphology)	■ Appropriate siting of bridge and culvert engineering operations in order to avoid damage to important benthic environments ■ Use of appropriate construction techniques to minimise soil compaction, such as restricting access during wet conditions ■ Using protective boarding and low-ground pressure machinery ■
Possible loss of cultural heritage during construction works	■ PIUs to ensure that contractor carefully follow the protocol and procedures to protect tangible and intangible cultural heritage (e.g., protection of community graves or no-disruption to cultural/religious events, and development of cultural heritage mitigation plans as per ESS8)
Possible social tensions and conflicts, as a result of activities such as displacement, marginalization of community groups (*see also the LMP on management of labour-related risks*)	■ Comply with the RPF ■ Prepare and implement RAP for each of the four municipalities ■ Ensure all resettlement issues are resolved prior to the start of construction ■ Ensure continual community consultation, and ensure that vulnerable groups and traditionally marginalized groups are represented

	■ All public consultation meetings are to be well documented ■ Ensure establishment of functioning GRM to promptly address community and worker grievances ■ Proper selection of construction workers, with priority given to hiring of qualified members of project affected households, local residents and IDPs ■ Holding of orientation to all construction workers on local customs and traditions
Exclusion of women and GBV risks	■ See Annex 5: Gender mainstream and GBV Action Plan
Road traffic incidents as a result of roadworks	■ Conduct public information drive ■ Erect informative sign at strategic areas along the road alignment to advise local residents and motorists of the traffic management plan, including the alternative routes ■ Deploy traffic aides to guide motorists and pedestrians along the construction area or alternative routes ■ Deploy law enforcers from the municipal authorities or local police units to implement traffic rules including vehicular speed limit ■ Add speed calming measures into design ■ Local governments in Mogadishu, Garowe, Baidoa and Kismayo to conduct regular maintenance of the upgraded road
Community health and safety	■ Establish and maintain continuous liaison with the host communities including sensitization on safety and health issues on construction sites ■ Prepare and implement construction traffic management plan, incorporating safety of other traffic ■ Install and maintain appropriate safety and warning signages along road sections and other construction sites like quarries, batching plants and camps where works are undergoing ■ Use of local language and images for signage shall be encouraged

	■ Ensure that all potentially dangerous work areas have controlled access limited to authorized persons only ■ Ensure proper and adequate provision of sanitation and waste management facilities at all construction sites ■ Maintain a system of receiving and responding to any safety concerns by the communities
Negative social implications attributable to labour influx	■ Contractor to prepare and enforce a No Sexual Harassment Policy in accordance with national law where applicable ■ All workers and nearby communities and stakeholders will be educated on preventing and responding to sexual harassment and GBV ahead of any project related works ■ The community within the vicinity of the road where construction will take place will also be educated on gender-based violence and sexual offenses such as sexual harassment, rape and defilement in the context of labour influx and the prevention and response measures. ■ Strategies such as male involvement will be employed in preventing and responding to GBV and sexual harassment ■ Partnerships will be established with relevant government agencies and NGOs to ensure survivors of GBV and sexual offenses access survivor centred services such as medical care, psychosocial support, legal redress, safety, etc as and when necessary ■ Provision of gender disaggregated data, separate bathing, changing, sanitation facilities for men and women ■ Impose zero tolerance on sexual harassment, all forms of gender-based violence and discrimination at all phases of the project ■ Grievance redress mechanisms including non-retaliation should be set up for the workers

6.13 GENDER MAINSTREAMING AND GBV ACTION PLAN

6.13.1 Gender mainstreaming

Under the General Principles of Human Rights, the constitution articulates provisions prohibiting discrimination across numerous categories, including on the basis on gender. The Constitution further providers for numerous protections; Women are given the right to education, allowed to work, own properties, hold public office, and receive inheritance. The Federal Government of Somalia and regional administrations have further demonstrated a strong commitment to addressing key socio-economic disparities and factors of exclusion, including through key frameworks such as the National Gender Policy and the National Development Plan.

At the same time, Somalia's socio-economic indicators remain among the lowest in the world for both males and females and gender disparities are stark. Women and girls, as well as minority groups and IDPs, confront multiple dimensions of disempowerment and discrimination across most categories of social, economic and human development.[13] Gender inequality and exclusion are linked to the persistence of discriminatory norms and relations, and absence of key resources that collectively limit women's roles outside the domestic sphere and circumscribe their presence and participation in political and public decision-making fora.

Women are important economic actors in Somali society. According to select estimates, Somali women are the main breadwinners in 70 percent of families and make up approximately 60 percent of business owners.[14] Women have made further gains economically, expanding into employment and livelihood sectors traditionally held by men, particularly as more women assume responsibility for household income generation.

Despite their increasing engagement in economic activities, women are poorer than men, as wealth is unevenly distributed in the household and across the entire economy. Economic opportunities, for men and women alike, are also limited. According to the 2019 World Bank Somali Poverty and Vulnerability Assessment, only 37 % of women participate in the labor market, compared with 58% of men. Despite the fact that a majority (64 %) of Somali households report perceptions that most or all women can work outside the home, a large number of women remain at home to care for families. The 2019 National Employment Policy (NEP) attributes the low levels of female participation in the labor market to "the patriarchal nature of society and customs which restrict the participation of women in a number of areas." According to a 2016 UNFPA report, the vast majority (68%) of employed Somali women are active in agriculture, livestock, forestry or fishery sectors, followed by 14.7% in services. Transport infrastructure remains dominated by men in Somalia.

Even among those engaged in income generating activities, the majority are in the informal micro-enterprise sector, and the women have limited education and lack basic business skills.

[13] Musse F, and Gardner J., A Gender Profile of Somalia (October 2013, updated from the 2007 version)

[14] UNDP (2014), Role of Somali Women in the Private Sector.

Furthermore, women's involvement in wage labor is low (33-40 percent) and predominantly concentrated in the agriculture sector.[15]

Additionally, women have been moving into economic terrain previously dominated by men, there has been little to no shift in men's participation in domestic tasks. Women are therefore bearing the double domestic burden of earning an income and taking care of the home. The consequences of this burden often fall to girls in the family, who are expected to contribute to the maintenance of the home, often at the expense of education and skills development; according to the 2012 Human Development Report, over 30% girls list "work at home" as their reason for not attending school, as compared to 10% boys.

Given these persistent gaps and discriminatory norms, there are risks that disparities between men and women may possibly occur in the SURP II project in the course of its implementation, in areas such as exclusion from stakeholder engagement activities, priority in hiring, pay rates for similar work done, safe working environment, health and sanitary facilities in the work place and office and others.

To address such risks, SURP II will take a number of differentiated measures to include female members in stakeholder engagement processes (including consultation events and grievance redress committees); provision of job opportunities in subprojects' civil works; and fair working conditions (including provision of maternity leave and nursing breaks where relevant, and sufficient and suitable toilet and washing facilities, separate from men and women workers). These measures are also included in the LMP and SEF. Gender mainstreaming can be incorporated into the project with lessons from the Africa Region Gender Action Plan (GAP).[16] This plan lays out the World Bank Africa Region's strategy for addressing gender inequality. The plan's objective is to advance development for both men and women through operations grounded in robust evidence and informed country dialogue.

6.10.2. Management of GBV risks

GBV is widespread in Somalia, and considered to be a major obstacle to equality, peace and development in the country. Available data indicates that GBV is common in the lives of women and girls across the life course in Somalia, with some forms of GBV endemic. Intimate partner violence and sexual violence, the most prevalent types of GBV globally, are both commonplace in the lives of Somali women and girls, although there is limited data on which to estimate reliable prevalence and trends in perpetration and victimization rates over time. FGM/C has in the past been near universally practiced.

[15] Musse and Gardner 2013.

[16] See http://siteresources.worldbank.org/INTAFRICA/Resources/AFR-Gender-Action-Plan-FY13-17.pdf for more details

Conflicts, disasters and insecurity have in the past, and continue to, exacerbate risks associated with child marriage and intimate partner violence in Somalia. The effects that displacement has on increasing GBV risks and rates among internally displaced and refugee communities globally is increasingly recognized,[17] and evidence points to a similar escalation of violence against women catalaysed by conflict and climate-related displacement and associated stressors in Somalia. Child marriage has been adopted as a past coping strategy for drought-affected families in response to acute economic insecurity,[18] and the altered economic and social dynamics resulting from displacement have been linked to increased intimate partner violence perpetration among displaced populations in Somalia.[19]

Conflict in Somalia has given rise to new expressions of GBV in recent decades, in particular conflict-related sexual violence (CRSV), with both state and non-state actors implicated in perpetration. CRSV was a feature of interstate conflict in the 1970's, during the uprising against Siad Barre's regime and the ensuring protracted conflicts in Somalia throughout the late 1980's, 1990's and 2000s,[20] with mass rape, gang rape, abduction, sex trafficking and forced marriage all perpetrated by parties to conflict. Sexual violence has been deployed as a conflict strategy by armed actors to punish, humiliate and displace populations, and through forced marriages based on family, clan or political affiliation, to control women's fertility and reproductive capacities. Women and girls have also be exposed to sexual violence indirectly linked to conflict, opportunistically sexually asaulted by authorities, smugglers and traffickers, with displaced women and girls used as 'payment' for safe passage at checkpoints.[21]

Conflict and disaster-related displacement magnifies risks of sexual violence for women and girls in Somalia. Women and girls are at heightened risk of sexual assault during movement to new areas and once settled in displaced settings. Unsafe environments, eroded protection mechanisms and social cohesion, and a lack of safe livelihoods options all increase the incidence of opportunistic sexual violence perpetrated in and around displaced settings when women and girls are collecting water, firewood and other resources, and when in public spaces and accessing public facilities.[22]

Sexual exploitation and abuse of children and women by people in positions of authority and power are reportedly common in Somalia, and as elsewhere, linked to poverty, insecurity and

[17] Vu, A. et al (2014) 'The prevalence of sexual violence among female refugees in complex humanitarian emergencies: a systematic review and metaanalysis', in *PLOS Currents Disasters*: Stark, L and Ager (2011) 'A systematic review of prevalence studies of gender-based violence in complex emergencies', in *Trauma Violence Abuse* 2011;12:127–34.

[18] Ministry of Planning, Investment and Economic Development (2017) *Somalia Drought Impact & Needs Assessment,* Federal Government of Somalia, Mogadishu*;* Girls Not Brides (2018) *Child Marriage in Humanitarian Settings*, Girls Not Brides, London; Myers, J. (2013) *Untying the Knot: Exploring Child Marriage in Fragile Settings*, World Vision UK, London.

[19] Oxfam (2017) Rapid Gender Analysis for Oxfam Drought Response in Somaliland, Oxfam, June 2017.

[20] Musse, F. (2004) "War crimes against women and girls" in J. Gardner and J. El Bushra (eds) *Somalia: The Untold Story: The War through the eyes of Somalia Women*, Pluto Press, London.

[21] Musse (2004)

[22] Ministry of Planning, Investment and Economic Development (2017); Refugees International (2017) *On the Edge of Disaster: Somalis forced to flee drought and near famine conditions*, RI, Washington DC; Human Rights Watch (2014a) *Here, Rape is Normal*, HRW, New York.

impunity.[23] Athough the issue remains under-researched due to the significant sensitivies associated with it, there is evidence of high levels of sexual exploitation and abuse by domestic and foreign security forces and by civilians.[24] Anecdotal evidence from humanitarian and development agencies indicate that sexual exploitation and abuse is a largely unreported and significant problem in the country.

Ongoing insecurity in the country coupled with the increase in climate-related shocks and disasters are likely to create ongoing population displacement, further entrenching poverty among internal migrants and increasing exposure to GBV risks. Displaced, migrant and women from minority clans, or with no clan affiliation, are at particular risk of sexual exploitation and abuse and sex trafficking because of the double discrimination they face due to their economic and social vulnerability, discrimination and lack of access to protective resources and redress mechanisms.[25]

While incidence of GBV in Somalia is a significant contextual challenge, preliminary assessment of project-related Sexual Exploitation and Abuse (SEA)/GBV (based on the risk assessment tool) has been conducted during project preparation. Given the significant GBV risks the context of pervasive insecurity, the project will adopt a robust approach to address potential GBV risks. Relevant mitigation measures to address these risks will be included in the ESMP and other relevant safeguard instruments as follows:

- Code of conduct (CoC) for project workers with SEA/GBV-related protections, to be signed and understood by all contractor and consultant staff;
- Plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and SEA provisions;
- Mapping and collaboration with GBV service providers;
- A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centred response;
- An Accountability Framework that outlines how the PIUs/contractors will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators.
- Establishment of special channel/procedures for safe, confidential reporting of GBV incidence that connect to the project GRM, and enable training of GRM operators on how to respond to cases that come forward.

[23] See Reports of the United Nations Secretary-General on Sexual Violence in Conflict S/2019/280 and 2018/250; Human Right Watch (2014b*) "The Power These Men Have Over Us" Sexual Exploitation and Abuse by African Union Forces in Somalia*, HRW, New York.

[24] Human Rights Watch (2014)

[25] International Alert/CISP (2015); Wirtz A.L, Perrin N.A., Desgroppes A. et al (2018) Lifetime prevalence, correlates and health consequences of gender-based violence victimisation and perpetration among men and women in Somalia', *BMJ Glob Health* 2018;3; El Bushra, J. and Sahl, I.M.G. (2005*) Cycles of Violence: Gender relations and armed conflict*, ACORD, Nairobi.

- GBV requirements to be clarified in bidding documents (including requirements for CoCs, training of workers, and how GBV related costs will be covered in the contract); bid evaluation to include consideration for GBV response proposal; and
- Make additional funds available to implement measures to address GBV and SEA risks and impacts that may arise during project implementation.

The project will also include provision of capacity building and training of relevant stakeholders, including contractors and project workers, in additional to capacity building for government partners. A GBV expert will be hired to support the PCU and a technical specialist will also be brought on board to support the Supervision Consultant. GBV risks should be monitored throughout project implementation through regular re-assessment, particularly as new project locations are determined, and through regular monitoring engagement. To this end, a Third-Party Monitor will be hired to ensure sufficient monitoring and management of project-related SEA/GBV risks. This section is also presented as Annex 5 of this ESMF and relevant provisions should be incorporated into the ESMP of each subproject.

6.14 RESETTLEMENT POLICY FRAMEWORK FOR SURP II

Resettlement is broadly defined as the process by which those adversely affected are assisted in their efforts to improve, or at least to restore their incomes and living standards. Whenever and where the implementation of the SURP II project results in physical and economic displacement of persons and entities, then a Resettlement Plan will need to be prepared and implemented after approval by the PIUs and the Word bank. A Resettlement Policy Framework has been prepared for the SURP II project.

6.15 ENVIRONMENTAL AND SOCIAL MONITORING BY CONTRACTORS

Municipalities through PIU and supervision consultants will ensure contractors monitor, keep records and report on the following environmental and social issues for their sub-projects[26]:

- Safety: hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
- Environmental incidents and near misses: environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.

[26] The following list should be used in a manner proportional to the size, risk and impacts of each sub-project

- Major works: those undertaken and completed, progress against project schedule, and key work fronts (work areas).
- E&S requirements: noncompliance incidents with permits and national law (legal noncompliance), project commitments, or other E&S requirements.
- E&S inspections and audits: by contractor, engineer, or others, including authorities—to include date, inspector or auditor name, sites visited and records reviewed, major findings, and actions taken.
- Workers: number of workers, indication of origin (expatriate, local, non-local nationals, IDPs), gender, age with evidence that no child labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- Training on E&S issues: including dates, number of trainees, and topics.
- Footprint management: details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
- External stakeholder engagement: highlights, including formal and informal meetings, and information disclosure and dissemination—to include a breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups (e.g., disabled, elderly, children, etc.).
- Details of any security risks: details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project.
- Worker grievances: details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. time taken to resolve grievances.
- External stakeholder grievances: grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender-disaggregated.
- Major changes to contractor's environmental and social practices.
- Deficiency and performance management: actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or plans for actions to be taken—these should continue to be reported until municipalities/PIU determines the issue is resolved satisfactorily.
- Incidences of SEA and GBV reported and handled through the referral systems, number of perpetrators prosecuted.

6.16 ENVIRONMENTAL AND SOCIAL LIABILITIES OF CONTRACTORS

Contractors will be legally and financially accountable for any environmental or social damage or prejudice caused by their staff, and thus are expected to put in place controls and procedures to manage their environmental and social performance. A breakdown for the cost of noncompliance for each mitigation measure will be enclosed in bidding documents. These will include:

- Mitigation measures to be included in the contract will be specified in the subproject ESMP
- Deductions for environmental noncompliance will be added as a clause in the Bill of Quantities (BOQ) section
- Environmental penalties shall be calculated and deducted in each submitted invoice
- Any impact that is not properly mitigated will be the object of an environmental/social notice by the municipalities
- For minor infringements and social complaints, an incident which causes temporary but reversible damage, the contractor will be given a notice to remedy the problem and restore the environment. No further actions will be taken if the Project engineer confirms that restoration is done satisfactorily.
- For social notices, the Resident engineer will alert the contractor to remedy the social impact and the follow the issue until solved. If the contractor does not comply with the remediation request, work will be stopped and considered under no excused delay
- If the contractor hasn't remedied the environmental impact during the allotted time, the Project engineer will stop the work and give the contractor a notification indicating a financial penalty according to the non-complied mitigation measure that was specified in the bidding document.
- No further actions will be required if the Project engineer sees that restoration is done satisfactorily. Otherwise, if Contractor hasn't remedied the situation within one day any additional days of stopping work will be considered no excused delay.
- All workers signed code of conducts.
- All worker's grievances resolved.
- Through stakeholder's engagement plans ensure that the process of hiring local labour is agreed with all the stakeholders and clearly understood.
- Human rights are observed for all the workers.

7 ROLES AND RESPONSIBLITIES OF IMPLEMENTING ENTITIES

7.1 INTRODUCTION

The successful implementation of the ESMF for the SURP II depends on the commitment of the different territorial governments in Somalia, the private sector and related institutions, and the capacity within the institutions to apply or use the ESMF effectively, and the appropriate and functional institutional arrangements, among others. The section below describes the detailed roles and responsibilities of the key institutions involved in the implementation of the ESMF by project components.

7.2 PROJECT IMPLEMENTATION (PIUS AND PCU)

Project Implementation Units (PIUs) at the State-level will be established within the respective municipalities leading project implementation in Mogadishu, Garowe, Baidoa and Kismayo. They will have the overall responsibility for project management, coordinating project implementation, monitoring and evaluation, and reporting of results to stakeholders and developing environment and social safeguards frameworks and plans. An overall Project Coordination Unit (PCU) will be established at the Federal level, to be based within a yet-to-be-decided ministry, and which will be responsible for the overall coordination of the project implementation and oversight.

PIU staff for the project will either be seconded from government or hired as consultants, through a competitive process. Short-term local and international consultants will be recruited to support the PIUs as needed. The capacity in the PIUs will be enhanced through on-the-job training and mentoring by the Bank's technical staff working on fiduciary and safeguards and the task team leader.

PIUs will provide overall responsibility for safeguards due diligence, and compliance monitoring. During the meetings with World Bank Safeguards Specialists, all the PIUs were encouraged to appoint persons from within their ranks, who are qualified and up to the task, as Environment and Social Safeguards for the SURP II project: this will be both at the State- and Federal-levels. As at July 4, 2019, this has been achieved in three cities (Mogadishu, Garowe and Baidoa) and is still pending in Kismayo.

With regards to Safeguards, the PIUs will:

- Appoint full-time E & S Safeguards Specialists
- Ensure compliance with World Bank Environment and Social Standards and other relevant country laws as contained in this ESMF
- Support the smooth and efficient implementation of the SURP II project
- Undertake effective preparation, review, approval and implementation of the ESIA, and ESMP, based on this ESMF

PCU roles and responsibilities would include providing capacity building support to the PIUs as needed, doing quality assurance on preparation of new safeguards documents and spot checks on safeguards implementation and monitoring by the four cities targeted under SURP II.

7.3 PIU AND SAFEGUARDS

The Safeguards officers at the respective PIUs will specifically:

- Review all ESIAs, SMPs reports and documents prepared by environmental and social consultants to ensure compliance to the World Bank Environment and Social Standards;
- Ensure that the SURP II project design, specifications and budget adequately reflect the recommendations of the ESIAs/ESMPs;
- Co-ordinate application, follow up processing and obtain requisite clearances and approvals from the World Bank for the Contractor ESMPs submitted by the individual SURP II project contractors;
- 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, 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 and the PIU/MDAs 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 environment 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 Government MDAs and the World Bank during Project Review Missions.

7.4 ROLES AND RESPONSIBILITIES OF SURP II MUNICIPALITIES

Four municipalities and their associated government ministries, departments and agencies will be incorporated into the implementing of the SURP II project. Their roles and responsibilities are enumerated below.

- Take the lead in screening, scoping, review of draft ESMPs for the government, receiving comments from stakeholders during public hearing of SURP II,
- 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;
- Provide overall leadership during public consultation meetings with critical SURP II stakeholders, in order to gain their support/cooperation/consensus in established policy direction; and
- Ensure that SURP II implementers comply with all relevant environmental laws and policies.

7.5 WORLD BANK ROLES AND RESPONSIBILITIES

The World Bank will:

- Provide guidance on the compliance to Bank's Environment and Social Standards;
- Perform compliance monitoring of SURP II to ensure that its ESSs are complied with and conduct regular project review missions;
- Maintain an oversight role, review and approve SURP II's ESMF, and environmental assessment instruments such as any ESIA or ESMPs of sub-projects
- Conduct regular supervision missions to check on the performance of SURP II and assess its compliance to agreed grant covenants;
- Recommend measures for improving the performance of SURP II PIUs;
- Recommend the holding of appropriate training program intended to improve the capacity of PIUs as necessary

7.6 BUDGET FOR IMPLEMENTING THE ESMF

To effectively implement the environmental and social management measures suggested as part of the ESMF, resources will be required, to the tune of US$257,600[27]. An indicative budget has been provided in table 9, meant to cover safeguards related expenses such as

[27] Estimated – based on the cost of implementing ESMF and other Safeguards instruments in Mogadishu, extrapolated to the other three cities

capacity building programs, coordination and public consultation meetings, planning workshops, monitoring work, and 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 SURP II cost.

Table 10: Indicative Budgetary requirements for implementing the ESMF for SURP II (Mogadishu)

ESMF Requirements	Budget basis and assumptions	Total Cost
Capacity Building for PIU Personnel and Municipality	Training programs 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 UPDATING THE ESMF

This ESMF will be used for screening of sub-projects and as a guide for the preparation, review and approval of environmental assessment instruments (ESIA and ESMP). It will also be a reference in the implementation of the sub-projects and their respective ESMPs. Since there may be new developments, guidelines or national legislations issued after its (ESMF) approval and posting on the World Bank website, the ESMF may need to undergo updating from time to time.

7.8 DISCLOSURE OF SAFEGUARDS INSTRUMENTS

This ESMF has been prepared in consultation with the relevant stakeholders in Somalia (with meetings held in Mogadishu, Garowe, Baidoa and Kismayo). Copies of this ESMF and other safeguard instruments developed later (including ESIA and ESMPs), prepared for the sub-projects to be financed under SURP II, should be disclosed in compliance with relevant country regulations and the World Bank Environment and Social Standards. The ESMF will be disseminated within Somalia in all project sites. The executive summary will be translated into Somali language. It will also be disclosed in two daily newspapers for 21 days, or as required by country laws, while the World Bank will post the approved document at its Info Shop.

ANNEX 1: WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARDS

ESS1: Assessment and Management of Environmental and Social Risks and Impacts*[28]

This Standard sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing (IPF), in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

ESS2: Labour and Working Conditions*

This Standard recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

ESS3: Resource Efficiency and Pollution Prevention and Management*

This Standard recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life-cycle.

ESS4: Community Health and Safety*

This Standard addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.

ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement*

Involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources*

This Standard recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development and it recognizes the

[28] The asterisk sign (*) denotes that this Standard is applicable in SURP II project

importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. ESS6 also addresses sustainable management of primary production and harvesting of living natural resources, and recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples, whose access to, or use of, biodiversity or living natural resources may be affected by a project.

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

This Standard ensures that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. ESS7 is also meant to avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.

ESS8: Cultural Heritage*

This Standard recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. ESS8 sets out measures designed to protect cultural heritage throughout the project life-cycle.

ESS9: Financial Intermediaries (FIs)

This Standard recognizes that strong domestic capital and financial markets and access to finance are important for economic development, growth and poverty reduction. FIs are required to monitor and manage the environmental and social risks and impacts of their portfolio and FI subprojects, and monitor portfolio risk, as appropriate to the nature of intermediated financing. The way in which the FI will manage its portfolio will take various forms, depending on a number of considerations, including the capacity of the FI and the nature and scope of the funding to be provided by the FI.

ESS10: Stakeholder Engagement and Information Disclosure*

This Standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

More information on these Standards is available at http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf#page=53&zoom=80

ANNEX 2: INDICATIVE ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

No	ITEM	DETAILS				
INTRODUCTION						
1	**Project Name**	SURP II				
2	**Project Location**					
3	**Project Description (brief)**					
4	**Does the Project require any:**	*yes*	*no*	*If yes, extent in ha.*		
	Reclamation of land, wetlands					
	Clearing of grazing lands					
	Felling of trees					
5	**Minimum land area required for the proposed development (ha)**					
6	**Available total land area within the identified location (ha)**					
7	**Expected construction period**					
8	**Responsible contact person, contact Information**					
9	**Present land ownership**	*State:*	*Private:*	*Other:*		
10	**Source of funding**					
11	**Total Cost of the Project**					
12	**Anticipated Date of Completion**					
ENVIRONMENTAL IMPACT AND MITIGATION/ENHANCEMENT DURING CONSTRUCTION PERIOD						
	Impacts	H[29]	M[30]	L[31]	N/A	Mitigation/Enhancement
13	Soil erosion					
14	Water pollution					

[29] High

[30] Medium

[31] Low

15	Noise pollution					
16	Solid waste generation					
17	Loss of vegetation cover					
18	Habitat loss or fragmentation					
19	General disturbance to animal behaviour					
20	Interference with normal movement of animals					
21	Irreversible/irreparable environmental change					

COMMUNITY ENGAGEMENT

21	Number and nature of public consultation meetings conducted so far	Type of Meeting	Number of Meetings	Nature of Participants	Participants	
					Male	Female

CONTACT DETAILS OF OFFICIALS AND RECOMMENDATIONS

	Name of the person completing form	
	Designation and contact information	
	List of team members	
	Signature and date	
	Name of officer who checked this form	
	Designation and contact information	
	Remarks	
	Signature and Date	

ANNEX 3: DRAFT TERMS OF REFERENCE FOR AN ESIA FOR SITE-SPECIFIC SUB-PROJECT

1.0 INTRODUCTION

1.1 Purpose of the ESIA

There is need to carry out an Environmental and Social Impact Assessment (ESIA), which will have to comply with the environmental procedures of …….and with the environmental guidelines of the financing institutions, World Bank.

1.2 Objectives of the ESIA

The objectives of the ESIA are to:

- Thoroughly document baseline conditions of the study area and the socio-economic conditions of the affected communities;
- Place the ecological baseline conditions of the concession area in the context of the surrounding region;
- Inform, obtain and address contributions from stakeholders including relevant authorities and the public;
- Assess in detail, the environmental and social impact that would result from the project;
- Identify mitigation measures that would reduce the significance of predicted negative impacts or enhanced predicted benefits of the proposed project;
- Develop an appropriate environmental and social management plan ESMP) for the proposed project; and
- Meet the requirements of the national environmental regulatory agencies in ……. as well as international best practice for project of this nature.

The ESIA will identify the potential environmental and social impacts associated with the project and then provide the measures that will be required to manage those impacts, which will be incorporated into an ESMP. A multi-disciplinary team of experts will conduct the ESIA with the stages identified as follows:

2.0 PHASE DESCRIPTION

Screening/Scoping- Identification of key issues and concern that are to be addressed by the specialist studies
Stakeholders Engagement – Initial engagement of key stakeholders during scoping
Baseline Study - Characterize current broadly-defined environmental and social conditions on and near the site to serve as a basis against which impacts can be measured and monitored
Assessment and Mitigation - Identification of positive and negative impacts; the potential spatial extent, severity, duration and probability of impacts are described along with mitigation actions
Reporting - Collation of specialist studies and assessments and the compilation of the ESIA Report
Review - The ESIA Report is reviewed by the …..Ministry, sector agencies and stakeholders. All stakeholders in the process should have an opportunity to comment on the ESIA Report, in such a manner that any concerns are able to be taken into account.
The ESIA process will be guided by the [insert name of] Guidelines for EIA process as stipulated in Annex 6 and international best practice guidelines for projects of this nature such as the World Bank.

3.0 TASKS

The EMP, based on the Environmental and Social assessment, should identify those E&S issues that require a more detailed management plan in order to manage potential impacts and mitigation. In the conduct of the ESIA the consultant team will undertake the following tasks:

- Provide a detailed description of the project;
- Describe alternatives examined in developing the project;
- Identify the relevant laws, guidelines, regulations and standards that define the operating framework of the project;
- Assemble relevant baseline information on the project area including: geology, soils, hydrology, surface water quality, noise, air quality, climate, terrestrial and aquatic flora and fauna;
- Collect Information on the socio-economic background of the project area;
- Identify and assess the physical, biological, socio-economic impacts of the project;
- Identify and assess cumulative impacts;
- Identify and discuss mitigation measures for identified impacts and clearly identify residual impact;
- Conduct and document stakeholder engagement;
- Prepare an environmental and social management plan that recommends measures to address those adverse impacts that can be avoided, or reduced to acceptable levels; and
- Design a monitoring and auditing plan for the duration of the project.

4.0 SPECIFIC ISSUES TO BE ADDRESSED BY THE ESIA

The consultant team will address the full range of issues triggered by the proposed project.
Specific issues include:

- A detailed description of the project area including maps showing the boundaries of the project area, layout of current land uses of the surrounding areas and network of drainage systems;
- Current water quality data from surrounding streams, rivers and groundwater and the establishment of fixed stations for continuous monitoring;
- Dust and noise management in particular from haul roads;
- Impacts to aquatic and terrestrial flora and fauna;
- Water use and effluent management;
- Waste management;
- Land use;
- Cultural and archaeological resources;
- Occupational health and safety;
- Social and economic impacts to the local communities including direct benefits such as jobs;
- Cumulative and residual impacts of the project;
- An ESMP
- A Monitoring and Auditing Plan
- An Emergency Response Plan (to consider identification of emergencies, response mechanisms, personnel responsibilities and equipment and training requirements).

5.0 SITE VISIT AND SCOPING

The ESIA consultant will cover the cost of site visits associated with the conduct of the ESIA, public notices and other costs associated with the ESIA.

6.0 TECHNICAL TEAM

Team Members should satisfy these minimum requirements:

General Professional Experience:

Mandatory (must have)

- Science degree in relevant subject areas
- At least six years of professional working experience, (ten for team leader) of which three years must be related to ESIA in the sector, in the region
- Good communication skills, verbally and written
- Ability to work in a team (or lead a team, in the case of the team leader)
- Working knowledge of English (writing and speaking)

Desirable (nice to have)

- Knowledge of the country
- Knowledge of relevant local language (s)

Specific Professional Experience:

Mandatory

- Prior experience with <insert donor> policies and procedures
- Prior experience of EIA or ESIA, at least three previous assignments
- Prior experience of leading teams (for team leader) at least five previous assignments
- Prior experience of the specific sector, at least three previous assignments

Desirable (nice to have)

- Prior experience of ESIA in the sector in the country

7.0 ESIA REPORT

Outline for an Environmental and Social Impact Assessment Report:

An Environmental and Social Impact Assessment process should not exclusively be perceived as a matter of preparing a report and obtaining approval only, instead the use of the ESIA should help ensure that the environmental and social concerns of local communities and other stakeholders are taken into account throughout the life of the project. The ESIA should be tailored to the specific sub-project and to the legal requirements, environmental and social conditions where it is situated. The coverage of the ESIA report itself will depend on local circumstances. The identification and participation of relevant stakeholders is a critical part of the process. The following outline for a typical ESIA report is offered on the basis that identified issues will not necessarily have the same degree of relevance for all sub-projects:

Executive Summary or Non-Technical Summary – To be written in non-technical language, be translated into the major indigenous language (s), and be accessible and understandable to the relevant stakeholders and/or affected communities

Methods and Key Issues – This provides the opportunity to clarify some basic information about the ESIA including what difficulties have been encountered and the limitation of the assessment.

Legislative Framework – The legislative framework should include the relevant legislation and requirements of the country and region where the project is situated. It is also important to include a statement that commits the project to compliance.

Consultation Process – Should contain the step-by-step approach and views expressed. If clear recommendations resulting from the consultation process were not followed, the reasons for those decisions should be provided.

Description of the Environmental and Social Baseline – Should describe information collected in order to provide a picture of existing trends resulting from natural events or human activities, the current state of

the environment, the current socio-economic conditions in the project area, and any potential future changes which may occur as a result of planned developments.

Consideration of Alternatives – Should present the results of a well-thought-out process that has ensured that reasonable alternatives of different types have been considered.

Description of the Proposed Development – Should cover the purpose and scope of the sub-project, an overview of the sub-project and its location, a detailed description and layout, the site preparation and construction, and the nature of the process, as well as resources and technologies to be used.

Prediction and Evaluation of Significant Environmental and Social Impacts – Should emphasize the most important impacts, who or what these will affect, and how significant the effect will be.

Mitigation/Offset Measures – Should provide an assessment of the hierarchy of impacts and whether mitigation measures proposed to alleviate the impacts and residual and/or cumulative effects. Proposed methodology to reduce negative impacts should also be included.

Environmental and Social Management Plan – Should provide a framework for managing and monitoring impacts (implementation costs inclusive) for the duration of the sub-project, and ensuring corrective measures. It should be designed to ensure that the commitments made in the ESIA, and in any subsequent assessment reports, together with any license approval or similar conditions are implemented.

Monitoring and Auditing Plan – The monitoring plan is primarily to ensure a project is implemented (pre-construction, construction and commissioning) with commitments made in the ESIA. The auditing plan is primarily to ensure a project is operated (after commissioning) in accordance with commitments made in the ESIA.

Bibliography – A list of all references cited should be included in the report.

8.0 THE TECHNICAL TEAM

One-page CVs of each technical team members should be appended to the ESIA Report.

9.0 MANAGEMENT OF THE ESIA PROCESS

The consultant will manage the overall ESIA process and will be responsible for the compilation and presentation of the ESIA Report. The consultant will plan, coordinate and execute all activities of the ESIA process as well as in the planning and execution of the public scoping meeting and public hearing if required. The consultant will provide updates to all relevant agencies on the ESIA process.

10. DURATION

The duration for the preparation of ESIA will be adequate to describe the base line accurately, taking into account any potential seasonal changes.

11. ESIA SUBMISSION

This will be discussed with the commissioning authority.

ANNEX 4: DRAFT TERMS OF REFERENCE FOR AN ESMP FOR A SUB-PROJECT

Introduction and Project Description:
Give a short description of the project
Purpose
Indicate the objectives and the project activities, the activities that may cause environmental and social negative impacts and needing adequate mitigation measures.
Tasks
The ESMP should cover:

- Potential environmental and social impacts resulting from project activities;
- Proposed mitigation measures;
- Institutional responsibilities for implementation;
- Monitoring indicators
- Institutional responsibilities for monitoring and implementation of mitigation measures;
- Costs of activities; and
- Calendar of implementation

The ESMP results and the proposed mitigation measures should be discussed with relevant stakeholders, NGOs, local administration and other organizations mainly involved in the project activities. Recommendations from these public consultations should be included in the final ESMP.
Format

- Cover page
- Table of Contents
- List of Abbreviations, Acronyms and Units
- Introduction
- Project Site Description and Process
- Applicable standards: including World Banks Operational Performance Standards. Country Standards, Other funding partner standards, other international standards, if appropriate (ISO, WMO, WHO and so on) and other elements of good international practice. If there are specific international standards or practices that need to be met, these should be listed
- Description of environmental and social impacts and mitigation measures for project activities
- Institutional framework, roles and responsibilities, action parties
- Monitoring indicators
- ESMP Training requirements, if any

Timescale
The consultant will produce the final ESMP one week after receiving consolidated comments from the World Bank, relevant Country institutions
Deliverables
Draft and Final ESMP (soft copy only)

ANNEX 5: GENDER MAINSTREAMING AND GBV ACTION PLAN

1. Gender mainstreaming

Under the General Principles of Human Rights, the constitution articulates provisions prohibiting discrimination across numerous categories, including on the basis on gender. The Constitution further providers for numerous protections; Women are given the right to education, allowed to work, own properties, hold public office, and receive inheritance. The Federal Government of Somalia and regional administrations have further demonstrated a strong commitment to addressing key socio-economic disparities and factors of exclusion, including through key frameworks such as the National Gender Policy and the National Development Plan.

At the same time, Somalia's socio-economic indicators remain among the lowest in the world for both males and females and gender disparities are stark. Women and girls, as well as minority groups and IDPs, confront multiple dimensions of disempowerment and discrimination across most categories of social, economic and human development.[32] Gender inequality and exclusion are linked to the persistence of discriminatory norms and relations, and absence of key resources that collectively limit women's roles outside the domestic sphere and circumscribe their presence and participation in political and public decision-making fora.

Women are important economic actors in Somali society. According to select estimates, Somali women are the main breadwinners in 70 percent of families and make up approximately 60 percent of business owners.[33] Women have made further gains economically, expanding into employment and livelihood sectors traditionally held by men, particularly as more women assume responsibility for household income generation.

Despite their increasing engagement in economic activities, women are poorer than men, as wealth is unevenly distributed in the household and across the entire economy. Economic opportunities, for men and women alike, are also limited. According to the 2019 World Bank Somali Poverty and Vulnerability Assessment, only 37 % of women participate in the labor market, compared with 58% of men. Despite the fact that a majority (64 %) of Somali households report perceptions that most or all women can work outside the home, a large number of women remain at home to care for families. The 2019 National Employment Policy (NEP) attributes the low levels of female participation in the labor market to "the patriarchal nature of society and customs which restrict the participation of women in a number of areas." According to a 2016 UNFPA report, the vast majority (68%) of employed Somali women are active in agriculture, livestock, forestry or fishery sectors, followed by 14.7% in services. Transport infrastructure remains dominated by men in Somalia.

Even among those engaged in income generating activities, the majority are in the informalmicroenterprise sector, and the women have limited education and lack basic

[32] Musse F, and Gardner J., A Gender Profile of Somalia (October 2013, updated from the 2007 version)

[33] UNDP (2014), Role of Somali Women in the Private Sector.

business skills. Furthermore, women's involvement in wage labor is low (33-40 percent) and predominantly concentrated in the agriculture sector.[34]

Additionally, women have been moving into economic terrain previously dominated by men, there has been little to no shift in men's participation in domestic tasks. Women are therefore bearing the double domestic burden of earning an income and taking care of the home. The consequences of this burden often fall to girls in the family, who are expected to contribute to the maintenance of the home, often at the expense of education and skills development; according to the 2012 Human Development Report, over 30% girls list "work at home" as their reason for not attending school, as compared to 10% boys.

Given these persistent gaps and discriminatory norms, there are risks that disparities between men and women may possibly occur in the SURP II project in the course of its implementation, in areas such as exclusion from stakeholder engagement activities, priority in hiring, pay rates for similar work done, safe working environment, health and sanitary facilities in the work place and office and others.

To address such risks, SURP II will take a number of differentiated measures to include female members in stakeholder engagement processes (including consultation events and grievance redress committees); provision of job opportunities in subprojects' civil works; and fair working conditions (including provision of maternity leave and nursing breaks where relevant, and sufficient and suitable toilet and washing facilities, separate from men and women workers). These measures are also included in the LMP and SEF.

Gender mainstreaming can be incorporated into the project with lessons from the Africa Region Gender Action Plan (GAP).[35] This plan lays out the World Bank Africa Region's strategy for addressing gender inequality. The plan's objective is to advance development for both men and women through operations grounded in robust evidence and informed country dialogue.

2. Management of GBV risks

GBV is widespread in Somalia and considered to be a major obstacle to equality, peace and development in the country. Available data indicates that GBV is common in the lives of women and girls across the life course in Somalia, with some forms of GBV endemic. Intimate partner violence and sexual violence, the most prevalent types of GBV globally, are both commonplace in the lives of Somali women and girls, although there is limited data on which to estimate reliable prevalence and trends in perpetration and victimization rates over time. FGM/C has in the past been near universally practiced.

Conflicts, disasters and insecurity have in the past, and continue to, exacerbate risks associated with child marriage and intimate partner violence in Somalia. The effects that displacement has on increasing GBV risks and rates among internally displaced and

[34] Musse and Gardner 2013.

[35] See http://siteresources.worldbank.org/INTAFRICA/Resources/AFR-Gender-Action-Plan-FY13-17.pdf for more details

refugee communities globally is increasingly recognized,[36] and evidence points to a similar escalation of violence against women catalysed by conflict and climate-related displacement and associated stressors in Somalia. Child marriage has been adopted as a past coping strategy for drought-affected families in response to acute economic insecurity,[37] and the altered economic and social dynamics resulting from displacement have been linked to increased intimate partner violence perpetration among displaced populations in Somalia.[38]

Conflict in Somalia has given rise to new expressions of GBV in recent decades, in particular conflict-related sexual violence (CRSV), with both state and non-state actors implicated in perpetration. CRSV was a feature of interstate conflict in the 1970's, during the uprising against Siad Barre's regime and the ensuring protracted conflicts in Somalia throughout the late 1980's, 1990's and 2000s,[39] with mass rape, gang rape, abduction, sex trafficking and forced marriage all perpetrated by parties to conflict. Sexual violence has been deployed as a conflict strategy by armed actors to punish, humiliate and displace populations, and through forced marriages based on family, clan or political affiliation, to control women's fertility and reproductive capacities. Women and girls have also be exposed to sexual violence indirectly linked to conflict, opportunistically sexually asaulted by authorities, smugglers and traffickers, with displaced women and girls used as 'payment' for safe passage at checkpoints.[40]

Conflict and disaster-related displacement magnifies risks of sexual violence for women and girls in Somalia. Women and girls are at heightened risk of sexual assault during movement to new areas and once settled in displaced settings. Unsafe environments, eroded protection mechanisms and social cohesion, and a lack of safe livelihoods options all increase the incidence of opportunistic sexual violence perpetrated in and around displaced settings when women and girls are collecting water, firewood and other resources, and when in public spaces and accessing public facilities.[41]

Sexual exploitation and abuse of children and women by people in positions of authority and power are reportedly common in Somalia, and as elsewhere, linked to poverty, insecurity and impunity.[42] Athough the issue remains under-researched due to the significant sensitivies associated with it, there is evidence of high levels of sexual

[36] Vu, A. et al (2014) 'The prevalence of sexual violence among female refugees in complex humanitarian emergencies: a systematic review and metaanalysis', in *PLOS Currents Disasters*: Stark, L and Ager (2011) 'A systematic review of prevalence studies of gender-based violence in complex emergencies', in *Trauma Violence Abuse* 2011;12:127–34.

[37] Ministry of Planning, Investment and Economic Development (2017) *Somalia Drought Impact & Needs Assessment,* Federal Government of Somalia, Mogadishu*;* Girls Not Brides (2018) *Child Marriage in Humanitarian Settings*, Girls Not Brides, London; Myers, J. (2013) *Untying the Knot: Exploring Child Marriage in Fragile Settings*, World Vision UK, London.

[38] Oxfam (2017) Rapid Gender Analysis for Oxfam Drought Response in Somaliland, Oxfam, June 2017.

[39] Musse, F. (2004) "War crimes against women and girls" in J. Gardner and J. El Bushra (eds) *Somalia: The Untold Story: The War through the eyes of Somalia Women*, Pluto Press, London.

[40] Musse (2004)

[41] Ministry of Planning, Investment and Economic Development (2017); Refugees International (2017) *On the Edge of Disaster: Somalis forced to flee drought and near famine conditions*, RI, Washington DC; Human Rights Watch (2014a) *Here, Rape is Normal*, HRW, New York.

[42] See Reports of the United Nations Secretary-General on Sexual Violence in Conflict S/2019/280 and 2018/250; Human Right Watch (2014b*) "The Power These Men Have Over Us" Sexual Exploitation and Abuse by African Union Forces in Somalia,* HRW, New York.

exploitation and abuse by domestic and foreign security forces and by civilians.[43] Anecdotal evidence from humanitarian and development agencies indicate that sexual exploitation and abuse is a largely unreported and significant problem in the country.

Ongoing insecurity in the country coupled with the increase in climate-related shocks and disasters are likely to create ongoing population displacement, further entrenching poverty among internal migrants and increasing exposure to GBV risks. Displaced, migrant and women from minority clans, or with no clan affiliation, are at particular risk of sexual exploitation and abuse and sex trafficking because of the double discrimination they face due to their economic and social vulnerability, discrimination and lack of access to protective resources and redress mechanisms.[44]

While incidence of GBV in Somalia is a significant contextual challenge, preliminary assessment of project-related Sexual Exploitation and Abuse (SEA)/GBV (based on the risk assessment tool) has been conducted during project preparation. Given the significant GBV risks the context of pervasive insecurity, the project will adopt a robust approach to address potential GBV risks. Relevant mitigation measures to address these risks will be included in the ESMP and other relevant Instrments as follows:

1) Code of conduct (CoC) for project workers with SEA/GBV-related protections, to be signed and understood by all contractor and consultant staff;
2) Plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and SEA provisions;
3) Mapping and collaboration with GBV service providers;
4) A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response;
5) An Accountability Framework that outlines how the PIU/contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators;
6) Establishment of special channel/procedures for safe, confidential reporting of GBV incidence that connect to the project GRM, and enable training of GRM operators on how to respond to cases that come forward;
7) GBV requirements to be clarified in bidding documents (including requirements for CoCs, training of workers, and how GBV related costs will be covered in the contract); bid evaluation to include consideration for GBV response proposal; and

[43] Human Rights Watch (2014)

[44] International Alert/CISP (2015); Wirtz A.L, Perrin N.A., Desgroppes A. et al (2018) Lifetime prevalence, correlates and health consequences of gender-based violence victimisation and perpetration among men and women in Somalia', *BMJ Glob Health* 2018;3; El Bushra, J. and Sahl, I.M.G. (2005*) Cycles of Violence: Gender relations and armed conflict,* ACORD, Nairobi.

8) Make additional funds available to implement measures to address GBV and SEA risks and impacts that may arise during Project implementation.

The project will also include provision of capacity building and training of relevant stakeholders, including contractors and project workers, in additional to capacity building for government partners. A GBV expert will be hired to support the PCU and a technical specialist will also be brought on board to support the Supervision Consultant. GBV risks should be monitored throughout project implementation through regular re-assessment, particularly as new project locations are determined, and through regular monitoring engagement. To this end, a Third-Party Monitor will be hired to ensure sufficient monitoring and management of project-related SEA/GBV risks.

ANNEX 6: 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. Under ESS 8, there will be aspects of important, intangible cultural heritage, which need consideration, especially in the ancient city of Mogadishu. Under SURP II, for example, the construction should not disturb events or ceremonials in nearby mosques or Islamic schools.

The initial phase of the proposed SURP II project interventions pose limited risks of damaging cultural property since projects will largely consist of small investments in urban road infrastructure and other relatively 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 7: INDICATIVE ENVIRONMENTAL STEWARDSHIP FRAMEWORK FOR CONTRACTORS

ENVIRONMENTAL STEWARDSHIP FOR URBAN INFRASTRUCTURE DEVELOPMENT FOR SURP II

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
Pre-construction/Construction Phase			
1	**Land Use**	Passage of contractor's vehicles through grazing reserves or cultivated and forested land resulting in a permanent loss of the resources. The environmental effects can amplify if proper operation and maintenance schedules are not followed.	Plan and file Vehicular Traffic Movements (VTMs) so as to as much as possible avoid trekking through grazing reserves or cultivated, thus minimizing loss of resources
2	**Material Use**	Excess extraction of local resources, such as wood, sand, soil, boulders, etc. Degradation of forests, erosion and landslide at steep locales due to boulder, stone extraction. Change in river and stream ecosystem due to unchecked sand extraction	Extract materials only on need basis Avoid sensitive areas, such as steep slopes Follow engineer's directions at all times
3	**Slope Stability**	Extraction of forest products and cutting of trees in the steep slopes increases soil erosion and landslide due to loss of soil binding materials Wrong alignment can trigger slope failure Haphazard disposal of construction waste can disturb slopes	Extract carefully and secure the top soil within 25 cm from the surface Limit down grading of the infrastructure such as temporary road to 50 If down grading exceeds 70, construction of side drainage is necessary Keep optimum balance in extraction and filling of soil works, geo-hazardous assessment and mapping

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
		Improper drainage facilities can result in erosion and landslides	Use designated disposal site and avoid side-casting of spoil Provide proper drainage Use bio-engineering on exposed slopes
4	**Wildlife**	Wildlife habitats at forests, shrub-lands along water infrastructure corridor are affected by the infrastructure construction activities Wildlife and human conflicts increase as wildlife might destroy the crops or attack the construction workers	Avoid as much as possible areas with high biodiversity Efficient movement of machinery and other traffic Control poaching activities and regulate movement of labour force and their dependents into the forest area District Forest or Range Office and its subsidiary body should be involved in monitoring the activities of the construction workers and officials to minimize wildlife harassing, trapping and poaching
5	**Drainage**	Higher flow rate of surface water and water logging induce landslides, erosion	It is strongly recommended that the cross-drainage outlets must be channeled to the confirmed natural drains If horizontal slope exceeds 5%, construction of flow control device necessary every 20 m
6	**Protection of Vegetation**	Protected areas and highly forested areas Degradation of forest areas Degradation of agricultural land	Use minimum and efficient use of wood products for construction Initiate plantation at damaged and damage prone areas Increase liability of local forest user groups Avoid protected areas or densely forested areas

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
7	**Disposal of Construction Wastes**	Dumping of wastes along the infrastructure such as roads or elsewhere	Selected spoil dumping sites should be used After disposal, the area should be levelled and compacted It is recommended to conserve the soil by planting indigenous plants including grasses Wastes could also be used as levelling materials along the infrastructure
8	**Disposal of Sanitary Wastes**	Unmanaged sanitary waste disposal creating health problems and public nuisance	Proper sanitation area needs to be demarcated Check for hygiene of work force
9	**Impacts on amenities**	Infrastructure such as road crossings at water supply, irrigation lines may be disturbed or damaged	Avoid as much as possible the crossing over such amenities
10	**Pollution**	Dust generation from construction activities, construction vehicular movement increases air pollution Noise pollution likely from construction machinery operation and vehicular movement Sanitary problems likely at the construction and workforce quarters.	Possibly construction period should be during any of the two rainy seasons when soil moisture content is highest in Somalia (March-May or October-December) Enforce speed limit of vehicles and construct the infrastructure such as road according to volume and size of traffic movement
Operation Phase			
1	**Encroachment**	Unmanaged settlement, constructions near the new water points	Community zoning recommended, with enforcement
3	**Pollution/Vehicle Emission**	Dust generation from vehicular movement increases air pollution Noise pollution likely from vehicular movement	Enforce speed limit of vehicles Maintain traffic size movement Discourage use of horns

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
4	**Aesthetics**	Infrastructure such as water construction is likely to increase landscape scars In addition if the construction spoils are disposed of improperly, the ground vegetation would be destroyed which will be visible from a distance	Such damage cannot be avoided but can be minimized through re-plantation of indigenous species and greenery development