





SOMALI URBAN RESILIENCE PROJECT II

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) and

STAKEHOLDER ENGAGEMENT PLAN (SEP)

GAROWE MUNICIPALITY

Final June 2021

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LIST OF ABBREVIATIONS AND ACRONYMS

Abbrev. or acronym	In full
ESF:	Environmental and Social Framework (of the World Bank)
FGS:	Federal Government of Somalia
GM:	Garowe Municipality
KM:	Kismayo Municipality
CERC:	Contingent Emergency Response Component
ESMP:	Environmental and Social Management Plan
IDPs:	Internally Displaced Persons
km:	Kilometers
Km ² :	Kilometers Squared
мсн:	Mother and Child Health
MoEACC	Ministry of Environment, Agriculture and Climate Change
MoPW	Ministry of Public Works
MPF	Multipartner Fund
NESOM	National Electric Somalia
NUWACO	Nugaal Water Company
PES:	Population Estimation Survey
PAPs:	Project Affected Parties
PIU:	Project Implementation Unit
RAP:	Resettlement Action Plan

ROW:	Right of Way	
SUIPP:	Somali Urban Investment Planning Project	
SURP:	Somali Urban Resilience Project	
SEA:	Sexual Exploitation and Abuse	
GBV:	Gender Based Violence	
WB:	World Bank	

EXECUTIVE SUMMARY

This Environmental and Social Management Plan (ESMP), which includes the Stakeholder Engagement Plan (SEP), has been prepared for the Somalia Urban Resilience Project Phase Two (SURP II). The Project will finance the construction of five key urban roads, including 30ka Road, Wadajir-Waberi Road, Gambol Road, Inji Road and Towfiq Road. The five roads have a total length of about 7.6 km within Garowe City. The proponent of the Project is the World Bank and the implementing agency is Garowe Municipality (GM). The ESMP has been developed following the World Bank Environmental and Social Framework (ESF), national and state level regulatory requirements and applicable World Bank Environmental, Social, Health and Safety (ESHS) Guidelines. The World Bank Environmental and Social Standards (ESS) applicable to this project are eight.

The ESMP is required to identify and assess environmental and social issues associated with the proposed activities and develop mitigation measures consistent with World Bank requirements. This ESMP has been prepared as part of the overall environmental and social safeguards package, which includes the following additional instruments:

- Environmental and Social Management Framework,
- Labor Management Procedure,
- Stakeholder Engagement Plan (which is included in this document),
- Resettlement Action Plan, and
- Security Management Plan.

The information that was used to prepare this ESMP was sourced through several methods including stakeholder consultations and socio-economic survey. Site-specific potential impacts and risks were identified and screened. It is envisaged that the activities of the project will cause some moderate, short-term and localized adverse environmental and social impacts and risks. A summary of the positive and the negative impacts has been outlined below. Mitigation measures are provided and are expected to address all the identified impacts.

Negative impacts during the construction phase include:

• Impacts on project affected persons (PAPs);¹

¹There are total of 25 project affected properties, including two rooms, four kitchen, five fence walls, two "berkeds" (traditional Somali water storage cisterns), five temporary kiosks, five pit latrines, and two septic tanks. The main mitigation measure proposed is compensation for the affected properties. PAPs will be compensated for their losses at full replacement cost, prior to the commencement of project civil works. The assessed values for monetary compensation for PAPs (for structures and assistance for vulnerable persons) amount to US Dollar Twenty-Eight Thousand Two-Hundred Eighty-Seven (US\$28,287.00).

- Pollution (air, noise, and water), including emissions of pollutant noxious gases from vehicle combustion engines, and possible contamination of groundwater and soil resources by oil, grease, fuel and other lubricants from equipment or heavy vehicles;
- Public health hazard from construction sites risks and accidents, dust pollution, traffic safety;
- Generation of solid (and liquid) waste, including construction debris;
- Increased stormwater runoff as a result of pavement strengthening and reduction in infiltration rates;
- Worker exposure to occupational hazards or accidents associated with the construction works;
- Transmission of contagious diseases or communicable pandemics (e.g. HIV, COVID19);
- Labour influx and attendant risks, including gender-based violence/sexual exploitation and abuse (GBV/SEA);
- Child labor;
- Community exposure to hazards associated with the construction works;
- Risks related to establishment and use of material sites, and
- Disruption of traffic, temporary restriction of access

The environmental and social risks and impacts envisaged during the operational phase of the project include:

- Traffic safety;
- Risks to personal security and safety on account of envisaged longer night-time trading hours:

Positive impacts during construction phase include:

- Project construction works will likely be labour intensive, meaning that a significant number of employment opportunities will be created for residents of Garowe both skilled and unskilled:
- Increase in incomes from the temporary employment of locals during the road construction works;
- Improvement in economic activity through increased trading opportunities, especially for suppliers of materials and other value chain actors in the construction sector;

Once operational, the following positive impacts and outcomes are expected:

- Improved air quality due to reduced air pollution caused by dust, traffic congestion and fuel combustion;
- Enhanced safe access to the selected zones in Garowe for both pedestrian and vehicular traffic;

- Improved community access to social services and reduced travel time as a result of reduced traffic congestion;
- Less expense on vehicle wear and tear;
- Rapid transport movements, especially for residents to markets and shops thereby promoting supply of goods and products at lower prices;
- Improved access to health care, education and other social services;
- Increase in nighttime trading hours as a result of installation of streetlights;
- Reduction in generation of dust and other air irritants, with positive health outcomes for the people;
- Improvements in traffic safety by grade separation of different modes of traffic; and
- General improvement of the city through gentrification of the selected road corridors.

The ESMP will be implemented by the Contractor under the supervision of UNOPS and GM, estimated budget for the implementation of the ESMP is USD 6,000 which will be mainly used for capacity building and training, public consultation meetings and GRC training.

PROJECT BACKGROUND

1.0 Introduction

The Somalia Urban Resilience Project (SURP) II has a project budget of US\$112 million (US\$62 million from the Multi-Partner Fund Somalia and US\$50 million from the International Development Association, IDA). Four cities have been selected for urban regeneration and renewal. The four cities, namely Baidoa, Garowe, Kismayo and Mogadishu, were selected based on their political, economic, and security relevance as well as their specific vulnerabilities, including concentration of Internally Displaced Persons (IDPs) and their roles as centres of urban population growth in Somalia.

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 project's theory of change is that supporting municipal governments' capacity to deliver much needed urban infrastructure would lend legitimacy to Somali authorities. It would demonstrate to the general populace the government's growing capacity to deliver visible and tangible improvements in the lives of its citizens, which is critical for sustaining social and political stability in the country.

1.1 OBJECTIVE AND COMPONENTS OF SURP II

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; and
- TA on **Sub-national 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.

1.2 Purpose of the Environmental and Social Management Plan

The purpose of the Environmental and Social Management Plan (ESMP) is to set out mitigation, monitoring and institutional measures to be taken during construction, operations and maintenance of the project to eliminate, reduce or offset adverse environmental and social impacts.

PROJECT AREA DESCRIPTION

2.1 INTRODUCTION

Garowe, the administrative capital of Puntland State of Somalia, is situated in the Nugaal Valley. This valley, which extends for 250 kilometers, is bounded by gradually ascending high plateaus that generally reach elevations of 500 to 1,000 m above sea level on the north, west, and south. The valley is characterised by watercourses, the beds of which have a few permanent wells. It is to these watercourses that the predominantly nomadic population returns during the dry season. As a result of the typology of the parent bedrock, there are high levels of salinity, which limits crop production.

Garowe has a hot desert climate (Köppen climate classification BWh). As such, the weather is generally hot, sunny and dry. However, the city experiences cold temperatures during the months of November to February every year. Low and erratic rainfall (less than 300 mm annually) means that the general plant population is desert-adapted. The main vegetation in the Nugaal Valley consists of open grasslands, shrubs (commiphora spp), Acacia trees and dominant grasses (indigofera spp). The valley is home to succulent flora and is particularly rich in local endemics. Gypsum hills located around Las Anod supports flora such as Aloe inermis, Dorstenia, Adenia, Raphanocarpus, Euphorbia, Pterodiscus, and Caralluma. A Las Anod National Park has been proposed to protect the fine scenery, rich and varied flora, and the Somali Wild Ass. The limestone plateau north of Eyl has also been proposed as a national park due to its rich endemic flora.

The city's origins began with raising of goats and camels, as well as being trading post for frankincense and myrrh collected from the wild trees further to the north. Population numbers are difficult to come by, but estimates show that the city may have population of 190,000 residents. As with most of Puntland, it is primarily inhabited by Somalis from the Harti Darod clan confederation, in particular the Majerteen, Dhulbahante and Leelkase Darood clans. There are what can be termed as minority groups, with various sub-clans of the Madhiban clan well represented.

2.2 Introduction to SURP II interventions in Garowe

Under the SURP II, in line with WB's selection criteria, Garowe Municipality (GM) has identified and prioritized five secondary roads which are currently graveled (unpaved) and in poor condition, contributing to economic losses due to wear and tear, as well as causing air pollution and attendant health impacts on the population. The five selected roads require

upgrading to bitumen standards. These roads cover an estimated length of 7.6² km and are located within the city and are inter-connected with existing roads. The selected five secondary roads that the SURP II will finance are indicated in the Table 2.1 below:

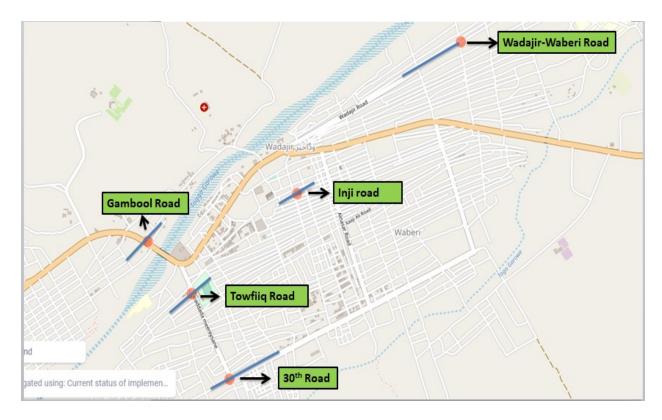
Table 2.1: Proposed roads under SURP II

S/N	Road name	Length	Description	Total Width
1 30-ka road		(km) 2.0	Dual carriageway: (road-width 20m including 1m median and 1 walkway each side)	20m
2 Street 3 (Injida)		0.7	Single carriageway: (road width 10m including 1.5m drainage and 1.5 walk way)	10m
3	Wadajir road (Roundabout)/Waberi road	1.4	Single carriageway: (road width 10m including 1.5 drainage and 1.5 walk way)	10m
4 Gambol road		1.36	Single carriageway: (road width 10m including 1.5 drainage and 1.5m walkway)	10m
5 Towfiq		2.14	Single carriageway: (road width 10m including 1.5m drainage and 1.5m walkway	10m
Total	l	7.6		

2.3DESCRIPTION OF THE PROJECT ROADS IN GAROWE

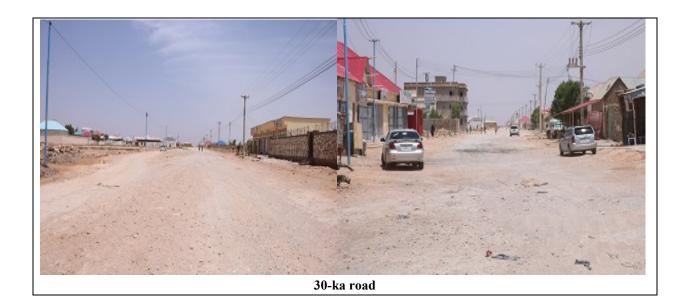
The map below shows the locations of the five roads that will be constructed under financing from SURP II.

² This is an estimated total length of selected roads; however, changes might be experienced after detailed engineering designs are done in each site. In case of any changes identified in the detailed engineering design, the ESMP will be updated accordingly.



30-ka road

This road segment is an extension of Road 30 to the western direction of the City. This road starts from Dr. Jim'ale Street and stretches up to 2.0km. The route is predominantly straight with few curves. The second priority bridge, Ligle Bridge, is located on this route. The topographic condition of the route is flat. It will be used as a by-pass for regional traffic that passes through the city (on the Galkaio-Bosaso corridor) once that bridge is constructed. Flooding is a major trait on this route following the flat longitudinal gradient. The available right of way (RoW) on this road is more than 20m except at one area where a house has encroached the road and requires demolishing and it will be possible to construct a 20m width road with minimum social impact (see the RAP for more details).



Street 3 (Injida)

This road connects two existing secondary roads (Islan Mohamed and Sheikh Abdulkadir roads). The biggest market of the city, where most of the residents of Garowe do their shopping, particularly groceries, is located along this road. Also, the bus stage for public service vehicles operating between the city and the neighboring IDP camps is located along this road. The condition of this road is gravel with wide width ranging from 10 to 15m. The RAP revealed that there will be no physical demolition of properties, but there will likely be restriction of residents' access during the period of road and drainage construction.



Wadajir road (Roundabout)/Waberi road

This road is within the city's central business district. The available road width ranges from maximum 15m to minimum 8m in some locations. The RAP survey revealed that this road will require demolishing of four extended fences that have encroached on the RoW.



Gambol road

This road segment stretches from the main trunk road and passes through one of the biggest secondary schools in Garowe, a university, a vocational training centre and the Garowe General Hospital. The length of this road is 1.36km with an available width of 10m. The Garowe Hospital Bridge, which will also be financed under SURP II, is attached to this road. Only one PAP was identified along this road.



Towfiq road

This road segment stretches from Dr. Jim'ale Street to 30ka roundabout. This alignment is proposed to be a secondary road as a by-pass for regional traffic travelling on the Bosaso-Galkaio corridor. The road length is 2.1 km. The route incorporates number of horizontal curves, while the vertical gradient varies from 0.0%-1.3%, with drainage challenges expected in areas with minimum gradient. No PAPs was identified during the RAP survey.



LEGAL AND INSTITUTIONAL FRAMEWORK

3.1 Introduction

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 activities in Garowe. The section begins with the existing legal and institutional framework in the Federal Government of Somalia, before focusing on the existing systems in Puntland State.

3.2 SOMALIA'S NATIONAL LEGAL AND INSTITUTIONAL FRAMEWORK

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, except for draft publications discussed below. 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.

Somalia National Environment Policy. The Somali Cabinet, on February 13, 2020, approved the National Environmental Policy. The stated goal of environmental policy is to improve the health and quality of life of the Somali people. The development of this policy was backstopped by the Global Environment Facility (GEF) and the United Nations Development Program (UNDP). This is the first time that an environmental policy has been developed and taken to Cabinet for approval since the collapse of the previous central administration in 1991.

Environmental Assessment Bill, Somalia. In November 2020, an environmental impact assessment bill was approved by the Somali cabinet and sent to the parliament for ratification. 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, EIAs and EAs, although at present

there are no enabling legislation or regulations in place, other than the aforementioned impact assessment bill.

Environmental and Social Impact Assessment Regulations of 2021 (draft). The Somali authorities have moved to give effect to the aforementioned Environmental Assessment Bill of 2020. As of March 2021, the Directorate of Environment and Climate Change has published environmental and social impact assessment regulations. These regulations will need to be adhered to by the contractors working for the Kismayo municipality.

Somalia National Construction Standards. The Ministry of Public Works and Reconstruction has published national construction standards. A policy has been announced which established standards for new public construction or renovation projects funded by, or on behalf of, the Government of Somalia. The policy goal is to provide access to public buildings by people with disabilities (PWDs). The national standards emphasize and promote "universal design," meaning that the design of structures, environments, and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized designs. Under these national standards, normal maintenance, re-roofing, painting or wallpapering, or changes to mechanical or electrical systems are not alterations and, therefore, the standards do not apply unless they affect the accessibility of the building or facility. This standard is important for the project, as it has implications for ensuring that the project works and the final products (i.e., roads) do not discriminate against persons with disabilities.

Somalia Labour Code. The Labour Code of 1972 stipulates that all employment contracts must include: a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and d) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labour inspector for preapproval. With regards to occupational health and safety (OHS) standards, the employer is obligated to provide adequate measures for health and safety, protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.

The Code further stipulates that workers have the right to submit complaints and the employer must give the complaints due consideration. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory with regard to age, gender and other aspects. Maximum number of working hours per week is 8 hours per day and 6 days per week. Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.

The Labour Code further forbids work for children below the age of 12, but allows employment of children between the ages of 12-15, but employment has to be compatible with proper protection, health and the moral of children. The Code also recognizes freedom of association.

Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade unions. Further, the Labour Code stipulates the right to equal pay for the same work and women are entitled to 14 weeks of maternity leave at half pay.

he Somali Penal Code of 1962 criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that 'carnal intercourse' and 'acts of lust committed with violence' are punishable with 5-15 years and 1-5 years of imprisonment, respectively. Abduction for the purpose of lust or marriage is prohibited under Art 401. The Family Code of 1975 sets the minimum age for marriage at 18 for males and females. Females between the age of 16 and 18 can marry with their guardian's consent. Marriage is based on equal rights and duties.

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

3.3 Puntland State's legal and institutional framework

The legislative and policy environment in Puntland is still relatively weak, although there has been good progress compared to the FGS legal and institutional framwork. 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 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 the SURP II project activities and their implementation in Garowe include:

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

The environmental licensing process in Puntland is relatively straightforward. Ministries control the licensing procedures, thus 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. However, it is unclear if school construction work in Puntland would have to be undertaken subject to the licensing requirements of the state's Environmental Impact Assessment Act. Schedule 1 of the Act classifies projects based on likely scale of adverse environmental impacts on the environment. In this Schedule, small-scale civil works of the nature envisaged in this project are not included. The Puntland Sexual Offences Act 2016 prohibits sexual harassment.

3.4 WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARDS

The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards (ESS's) that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity. There are ten ESSs that govern the management of environmental and social safeguards for projects of this nature. More details of the Framework is available on the Bank's website³:

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

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

The eight ESSs applicable to the Project are defined in the following sub-sections (3.1.1 to 3.1.8). More details on their relevance for the SURP II project activities in Garowe are highlighted in Table 3.1. The table also lists the actions to be taken by the municipal authorities in Garowe to comply with ESS requirements.

³https://projects.worldbank.org/en/projects-operations/environmental-and-social framework/brief/environmental-and-social-standards

ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

ESS 1 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, in order to achieve environmental and social outcomes consistent with the ESS's.

ESS 2: LABOR AND WORKING CONDITIONS

ESS2 sets out the Borrowers responsibilities to 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. The objectives of ESS 2 are to:

- Promote safety and health at work;
- Promote the fair treatment, non-discrimination and equal opportunity of project workers;
- Protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate;
- Prevent the use of all forms of forced labor and child labor;
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and
- Provide project workers with accessible means to raise workplace concerns.

ESS 3: Resource Efficiency and Pollution Prevention and Management

This ESS sets out the requirements of the Borrower to address resource efficiency and pollution prevention and management throughout the project life cycle consistent with Good International Industry Practice (GIIP). Objectives of ESS 3 are to:

- Promote the sustainable use of resources, including energy, water and raw materials;
- Avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities;
- Avoid or minimize project-related emissions of short and long-lived climate pollutants;
- Avoid or minimize generation of hazardous and non-hazardous waste;
- Minimize and manage the risks and impacts associated with pesticide use.

ESS4: COMMUNITY HEALTH AND SAFETY

ESS 4 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. Objectives are to:

 Anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and non-routine circumstances;

- Promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams;
- Avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials;
- Have in place effective measures to address emergency events;
- Ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.
- Apply the concept of universal access, where technically and financially feasible.

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

ESS5 sets out the responsibilities of the borrowers to address project-related land acquisition and restrictions on land use. Project-related land acquisition or restrictions on land use may cause a physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both.

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

This ESS is applicable to projects that potentially affect biodiversity or habitats, either positively or negatively, directly or indirectly, or that depend upon biodiversity of their success. ESS 6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development.

ESS 8: CULTURAL HERITAGE

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

ESS10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

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

ESS 10 applies to all projects supported by the Bank through Investment Project Financing. The Borrower will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation.

3.5 ACTIONS TAKEN BY GAROWE MUNICIPALITY TO COMPLY WITH ESS'S REQUIREMENTS OF THE PROJECT

This section describes the World Bank ESS's requirements for the Project and actions taken by Garowe Municipality to comply with ESS requirements. Eight ESSs will be relevant to SURP II project activities.

Table 3.1: World Bank ESS's Requirements Action Taken by GM

ESS	Applicability	Requirements of the ESS	Actions taken (or to be taken) by GM to comply with
		•	ESS requirements
ESS 1:	Applicable to	Conduct an environmental and social assessment of	Based on this ESMP findings the project activities will
Assessment and	this Project	the proposed project to assess the environmental and	likely have moderate adverse environmental and social
Management of		social risks and impacts of the project throughout the	risks and impacts. The envisaged risks and impacts are
Environmental and		project life cycle. The assessment should be	temporary in nature and limited to the construction
Social Risks and		proportionate to the risks and impacts of the project.	period and can be readily mitigated by the application of
Impacts			standard measures. The selected contractor will have in
			place its own Contractor Environmental and Social
			Management Plan (C-ESMP), with mitigation measures
			derived from Project's ESMP.
		Undertake stakeholder engagement and disclose	Garowe PIU engages its stakeholders through formal
		appropriate information in accordance with ESS10	meetings and publishing monthly reports. Information on
			SURP II preparation and previous phase has been shared
			with the stakeholders. This ESMP and its summary
			translation of Somali language and will be disclosed on
			the GM websites and appropriate media outlets.
		Develop an Environmental and Social Commitment	GM is committed to fulfill the ESCP jointly developed
		Plan (ESCP), and implement measures and actions set	with the World Bank. Implementation of actions
		out in the legal agreement including the ESCP	proposed in the ESCP is high priority.
		Conduct monitoring and reporting on the	Garowe PIU's Environmental and Social Specialist will
		Environmental and Social (E&S) performance of the	conduct regular monitoring of actions proposed in the
		project against the ESS's.	ESMP and ESCP, supported by UNOPS and the larger
			Garowe Municipality.
			GM PIU will prepare quarterly monitoring reports and
			submit to the World Bank.
			In case of any accidents, the GM PIU will provide

ESS	Applicability	Requirements of the ESS	Actions taken (or to be taken) by GM to comply with
			ESS requirements
			immediate notification to the World Bank.
		The project will apply the relevant requirements of the	This ESMP has incorporated the relevant mitigation
		Environmental Health and Safety Guidelines (EHSGs)	measures proposed in the World Bank Group's General
		of the World Bank.	EHSG.
ESS 2:	Applicable to		, , ,
Labour and	this Project	or engaged in connection with the project.	for heavy lifting and potentially hazardous work,
Workers Condition			including construction. The Project will not employ a
			child under the age of 15. Youths between the ages of
			15-18 will not be engaged in any high-risk or heavy
			construction activities but will be assigned light duties.
		Measures relating to occupational health and safety	This ESMP has included measures related to
		will be applied to the project. The OHS measures will	occupational health and safety of the construction
		include the requirements of this Section and will take	workers. These measures have been prepared to
		into account the General Environmental Health and	incorporate the mitigation measures proposed in the
		Safety Guidelines (EHSGs) and, as appropriate.	World Bank Group's General EHSG. A separate GRM
			for workers will be established by the GM at
			commencement of project implementation, with details
			communicated to workers. The entry point for all
			grievances by project workers will be the ES Specialist at
			GM, who will receive grievances by phone, text or email
			to publicized toll free mobile phone lines and email
			addresses. The specialist will acknowledge, log, forward,
			follow up grievance resolution and inform the
			complainant of the outcome. The complainant has the
			right to remain anonymous, thus their name and contacts
			will not be logged and whistleblower protection for
			complaints raised in good faith will be ensured. The
			specialist will carry out training of all GM staff involved
			with the project, and contractors on receiving complaints
			and referral and complaints handling and reporting.

ESS	Applicabili	ty	Requirements of the ESS	Actions taken (or to be taken) by GM to comply with ESS requirements
ESS 3: Resource Efficiency and Pollution Prevention and Management	Applicable the Project	to	Pollution prevention and management: GM will work to prevent the release of air, liquid or aerosol pollutants or, when avoidance is not feasible, comply with the national or EHSG standards, whichever is the more stringent. This applies to the release of pollutants to air, water and land resources due to routine, non-routine, and accidental circumstances, and with the potential for local impacts.	Somalia, in particular Puntland State, has, at the time of developing this ESMP, no known standards for air, noise and wastewater discharges: therefore,the World Bank Group EHSGs ⁴ on pollution abatement will be applied to the project. These include standards on "Air Emissions and Ambient Air Quality," "Energy Conservation," "Wastewater and Ambient Water Quality," "Water Conservation," "Hazardous Materials Management," "Waste Management," "Noise," and "Contaminated Land." Pollution prevention and management measures are included in this ESMP.
			GM will minimize the generation of waste including non-hazardous waste and manage the waste that is safe for human health and the environment.	The proposed construction activities in the Project are not expected to generate any hazardous waste. The waste and debris generated from the demolition activities and mold removal have already been executed and managed under "Phase 1" in accordance with the regulations on waste management.
ESS 4: Community Health and Safety	Applicable the Project	to	Evaluation of the risks and impacts on health and safety of the affected communities during project cycle and mitigation measures	The ESMP identified potential risks and impacts of the construction activities on the community and other road users and included measures to address these risks. This includes recommendations for inclusion of pedestrian safety elements into the project design, especially around sensitive receptors
			GM will design, construct and operate structural elements of the project considering safety risks to communities from flash floods during raining seasons.	The Project includes some construction of appropriate drainage channels for draining stormwater in the city. In addition, GM is planning to carry out feasibility study

⁴ More details of the World Bank Group's Environmental, Health and Safety Guidelines are available at: http://www.ifc.org/wps/wcm/connect/topics ext content/ifc external corporate site/ifc+sustainability/our+approach/risk+management/ehsguidelines

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Biodiversity Conservation and Sustainable Management of Living Natural the Project and promote living natural resources are coming from and the habitat type of the source area. The PIU will conduct construction activities, including waste management to avoid impacts on natural habitats, including nearby bodies of water.		A1:1-1	4 -	CM will protect different transport for the	
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Sustainable Management of Living Natural The PIU will conduct construction activities, including waste management to avoid impacts on natural habitats, including nearby bodies of water.	_	me Project		and promote fiving natural resources	are coming from and the nabital type of the source area.
Management of Living Natural waste management to avoid impacts on natural habitats, including nearby bodies of water.					The PIU will conduct construction activities, including
Living Natural including nearby bodies of water.					
Ziving i wastar	_				
K OCOUTOOC	Resources				8 y u

ESS	Applicability	Requirements of the ESS	Actions taken (or to be taken) by GM to comply with ESS requirements
ESS 8: Cultural Heritage	Applicable to the Project	GM will preserve tangible and intangible cultural heritage which includes mosques, graves, etc.	The project activities will not affect any cultural heritage. However, this ESMP gives mitigation measures to preserve heritage sites such as mosques, or in the event of significant chance finds of materials of cultural importance.
ESS 10: Stakeholder Engagement and Information Disclosure	Applicable to the Project	GM will identify the different stakeholders of the project, both project-affected parties and other interested parties. The PIU will develop and implement a Stakeholder Engagement Plan (SEP).	PIU currently engages its stakeholders through circulation of monthly updates and conducting meetings. Roads construction targets are being shared with the stakeholders to obtain their feedback. Furthermore, this process will be continued during the implementation of the Project. The Garowe SURP II SEP has been developed within the overall project's SEF.
		GM will disclose project information to allow stakeholders to understand the risks and impacts of the project.	The Project information is being shared with the stakeholders regularly through monthly progress reports and officials' meetings with project-affected stakeholders. The entire ESMP will be disclosed on the GM website and its availability will be communicated through newspaper notifications.
		GM will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts and mitigation measures	PIU has carried out stakeholder consultations on the RAP and on the ESMP/SEP.
		GM will continue to conduct stakeholder engagement in accordance with SEP during project implementation.	stakeholders through its 'Project Coordinator' using monthly progress reports and consultation meetings outcomes.
		GM will propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances from the project related parties related to the environmental and social	place to receive concerns and grievances from the

ESS	Applicability	Requirements of the ESS	Actions taken (or to be taken) by GM to comply with ESS requirements
		performance of the project in a timely manner.	

ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION

4.1 Introduction

Consistent with the World Bank's Environmental and Social Framework, specifically the ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), this section contains a preliminary summary of the impacts that are likely to result from the planned road construction works. In addition, the section also enumerates the positive environmental and social outcomes expected with the proposed interventions. This section also describes the proposed mitigation measures during the various project phases (Pre-construction, Construction & Operation) of the project.

4.2 Positive project outcomes

The construction and upgrading to bitumen standards on the selected roads will result in a number of positive impacts in Garowe, especially in the environments in which the roads are located and in contiguous areas.

Positive impacts during construction phase include:

- Project construction works will likely be labour intensive, meaning that a significant number of employment opportunities will be created for residents of Garowe – both skilled and unskilled
- Increase in incomes from the temporary employment of locals during the road construction works
- Improvement in economic activity through increased trading opportunities, especially for suppliers of materials and other value chain actors in the construction sector

Positive impacts during the operational period of the project includes:

- Improved air quality due to reduced air pollution caused by dust, traffic congestion and fuel combustion
- Increase in incomes from the temporary employment of locals during the road construction works
- Improved community access to social services and reduced travel time as a result of reduced traffic congestion
- Improvement in economic activity through increased trading opportunities, especially for suppliers of materials and other value chain actors in the construction sector
- Enhanced access to the selected zones in Garowe for both pedestrian and vehicular traffic
- Less expenses on vehicle wear and tear
- Rapid transport movements, especially for agricultural or livestock-based goods and products thereby promoting supply and lowering prices
- Improved access to health care, education and other social services

- Increase in nighttime trading hours as a result of installation of streetlights
- Reduction in generation of dust and other air irritants
- Improvements in traffic safety by grade separation of different modes of traffic
- General improvement of the city through gentrification of the selected road corridors

4.3 NEGATIVE ENVIRONMENTAL AND SOCIAL IMPACTS ENVISAGED

However, activities of the road construction are also anticipated to have some negative environmental and social impacts. Nevertheless, field survey shows that these impacts are not of a high magnitude and can be reasonably mitigated.

CONSTRUCTION STAGE

Potential Environmental, Social, Health and Safety (ESHS) risks and impacts of the Project have been assessed and are summarized below:

- Impacts on project affected persons (PAPs); There are total of 25 project affected properties, including two rooms, four kitchen, five fence walls, two "berkeds" (traditional Somali water storage cisterns), five temporary kiosks, five pit latrines, and two septic tanks. The main mitigation measure proposed is compensation for the affected properties. PAPs will be compensated for their losses at full replacement cost, prior to the commencement of project civil works. The assessed values for monetary compensation for PAPs (for structures and assistance for vulnerable persons) amount to US Dollar Twenty-Eight Thousand Two-Hundred Eighty-Seven (US\$28,287.00).
- Pollution (air, noise, and water), including emissions of pollutant noxious gases from vehicle combustion engines, and contamination of groundwater and soil resources by oil, grease, fuel and other lubricants from equipment or heavy vehicles
- Public health hazard from construction sites risks and accidents, traffic safety and generation of dust
- Generation of solid (and liquid) waste, including construction debris
- Possible damage to dry land vegetation on the road corridor
- Soil erosion
- Increased storm-water runoff as a result of pavement strengthening and reduction in infiltration rates
- Workers exposure to occupational hazards or accidents associated with the construction works;
- Increased pressure on water supply and sanitary facilities due to increased population (workers, supervisors, etc.)
- Transmission of contagious diseases or communicable pandemics (COVID19)

- Labour influx including gender-based violence/sexual exploitation and abuse (GBV/SEA);
- Child labor;
- Community exposure to hazards associated with the construction works;
- Risks related to establishment and use of materials sourcing sites;
- Disruption of traffic and temporary restrictions of access to residents in the road corridors
- Incidents; and
- Emergencies

Below is the summary of mitigation measures to be taken to address potential E&S risks and impacts. This table should be read in conjunction with the LMP and SMP, which have more indepth risk analysis and detailed management strategies on respective matters. Based on this table, the C-ESMP will be prepared with more subproject-specific detailed measures before commencement of civil works. The c-ESMP will be reviewed and cleared by the Bank team supporting the project. Supported by the supervising consultant (UNOPS), the PIU will monitor and report the implementation of these mitigation measures through the monitoring mechanisms as described in Section 8.

Table 4.1: Environmental and Social Impacts and Mitigation Measures in Construction Stage⁵

Table 4.1: Environmental and Social Impacts and Mitigation Measures in Construction Stage						1 '1'4	
ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsibility	
	of the Impact				(USD)	Implementation	Supervision
							Monitoring
Air pollution	Emissions from the construction equipment and vehicles	 The Contractor shall fit machinery and vehicles with appropriate exhaust systems and emission control devices and maintain the machinery and vehicles in good working condition. The Contractor shall service all equipment regularly to minimize emissions and maintain the record. 	Ongoing during the construction	Service check reports	Own cost (to be borne by the contract or)	Contractor	PIU, UNOPS, WB

⁵There is a risk of civil works beginning without completion of the mitigation measures enumerated in the RAP, including non-payment of compensation to PAPs. The nature and quantum of risks in this regard is contained in the RAP report. The RAP must be implemented fully prior to commencement of works in Garowe – and specifically on 30-ka Road, Wadajir Road, and Gambol Road.

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsibility	
	of the Impact				(USD)	Implementation	Supervision Monitoring
		 The Contractor will take every precaution to reduce the level of dust from construction plants, construction sites involving earthwork by sprinkling of water, and controlling sources of dust. All trucks, carrying construction debris shall be covered with cloth and/or wetted before to dispatch of every trip, to prevent spills as well as airborne dust during transit. Trucks shall not be overloaded beyond designated capacities. 	Daily	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own cost (to be borne by the contract or)	Contractor	PIU
Noise emission	Noise and vibrations from the construction activities will have an impact on the workers and residents	• The Contractor shall appropriately site all noise generating activities to avoid noise pollution to residents by ensuring that sensitive receptors are not affected (residential houses, mosques, schools). If possible, such activities shall be scheduled in the non-resting hours of the	Daily	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own cost (to be borne by the contract or)	Contractor	PIU, UNOPS, WB

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	idget Responsibility	
	of the Impact				(USD)	Implementation	Supervision Monitoring
		residents (which is between 7.00 am – 12.00 pm, and from 3.00 pm – 6.00pm). • The Contractor shall maintain all equipment to keep in good working. • The Contractor shall avoid unnecessary use of alarms and horns.					
Waste	Pollution from the improper management of wastes and excess materials from the construction	• The Contractor shall provide sufficient waste bins at the worksite for the collection of waste generated from the worksites. Separate bins will be provided for food waste and garbage.	Ongoing during construction	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contractor	PIU, UNOPS, WB, State government.

ESHS Impact	Description	Mi	tigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact					(USD)	Implementation	Supervision Monitoring
	sites. Most of the waste from the construction activities will be refuse and excess construction materials.	•	The Contractor shall carry these wastes in the covered truck for the safe disposal at the government's designated landfill, at own cost Reduce the generation of waste by using the principles of reduce, reduce and if possible recycle.	Ongoing during construction	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contractor	PIU
Water pollution	Water discharge if not contained will pollute the environment	•	The Contractor shall provide on-site mobile sanitary facilities, the affluent/waste discharges. Alternatively, the camp site shall be provided with septic tank with soak pit arrangement of adequate capacity. Runoff control measures should be installed and utilized throughout construction to avoid pollution of the adjacent land and waterbodies.	Ongoing during construction	EHS audit report Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contractor	PIU, UNOPS, WB
Floods, storm water	Floods, drainage including	•	The Contractor shall ensure that no construction materials like earth, stone	Ongoing during construction			Contractor	PIU, UNOPS, WB

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
	storm water management at operational areas	or are disposed of in a way that can block drainage in and around the working areas. • Ensure that the drains shall be periodically checked and cleaned throughout the construction phase for deposition of construction debris and follow it up with final clean up before handing over of the road.		Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own		
Utilities	Disruption of utilities such as water supply and power supply	 The Contractor should inform the public (in advance) on relocation of electric poles and/or repairing of water pipes. Restore the services within eight hours. During disruption provide temporary solutions to the residents (e.g. by trucking water to affected residents). 	Before relocation	Notice and publication dates or bulk SMS	Own cost (coordinated with service provide rs)	Contractor, NUWACO, NECSOM	PIU, UNOPS, WB
Temporary inaccessibility	Disruption of access from houses and shops to roads	• The Contractor shall provide strong temporary ramps made of wood/metal to allow residents to easily access to their houses,	Ongoing during construction	Site inspection report	Own costs	Contractor	PIU, UNOPS, WB

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
		shops or other buildings.					
Hazardous materials	Bitumen, fuel and lubricants will be used in the construction activities. Improper storage and handling of these products and potential spills may harm the environment or health of constructions workers and residents	 The Contractor shall store all hazardous materials appropriately in project areas and ensure that they are covered by tarpaulins to avoid direct exposure to rains, wind and sunlight; The Contractor will take all precautionary measures when handling, storing and disposal of bitumen, fuels and lubricants, minimising environment pollution, including ensuring that only trained personnel handle them. The Contractor shall have a sufficient number of spill kits on site along with trained personnel in use of the spill kits for control of material spills 	Ongoing during construction	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contractor	PIU, UNOPS, WB
Hazards at Worksite	Occupational health safety risks associated with the	• As part of the c-ESMP, Contractor shall carry out occupational hazard analysis at the construction sites and identify potential	Ongoing during construction	EHS audit report	Own	Contractor shall submit the occupational hazard analysis report	PIU and its Engineer will approve the report based on site

	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
0	of the Impact				(USD)	Implementation	Supervision
p co	- 1	hazards that may arise from the construction works to workers. The Contractor will identify ways to eliminate or control these hazards applying a hierarchy of control measures such as i) elimination of risk through physical removing the hazard; ii) engineering controls to minimize the risk; and iii) use of personal protective equipment (PPE) Placing of warning signs and imageries on hazards at the construction sites Ensure that EHS logbooks are on each of the sites, recording incidents and responses Contractor will provide first aid kits, and will have an agreement with nearby clinics for medical support in case of emergency,				_	

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
		measures on the roads under construction • Ensure that materials supply sites (quarries, borrow pits) are decommissioned after the end of the project • Work with GM and implement measures for establishing universal access within the project for all residents, including disabled					
	Lack of relevant PPE's will increase the risk of worker's exposure to construction hazards	 Contractor shall provide PPE for workers such as safety boots, helmets, masks, gloves and other necessary items based on the work requirements. All workers shall wear safety vests, helmets and safety shoes at all worksites. Workers shall maintain the PPE properly by cleaning dirty ones and replacing them with the damaged ones. To promote and encourage 	Ongoing during construction	Monthly report by contractor and Site inspection report by PIU and supervising consultant EHS audit reports	Own	Contractor	PIU, UNOPS, WB

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
		a safety culture, engineers in Contactor and Supervision's team shall also wear helmets and safety vest.					
	Lack of awareness among workers on ESHS risks and requirements of the Project	• The Contractor shall give all workers an orientation program, which familiarize the workers with work requirements, safety practices at work, safe distances to keep from earth moving equipment, first aid facilities, emergency response, onsite sanitation facilities and practices to be adopted, rights and privileges of workforce among others. Orientation shall be included concern for safety of public around operational areas.	Daily	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contractor	PIU, UNOPS, WB
	Lack of safe drinking water and sanitation facilities create	 The Contractor shall arrange safe drinking water, adequate rest and dining areas for the workers. The workers will use the 	Daily	Site inspection reports	Own	Contractor	PIU, UNOPS, WB

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
Health risks at	unhygienic conditions at worksites Monitoring	 toilet facilities available at temporary camp sites. All workers should be clean on a daily basis. The Contractor shall provide 	Ongoing	Incident	Own	Contractor	PIU,
work sites	and Emergency treatment for the injured workers	the following medical facilities for the construction workers: • A first aid centre shall be provided for the workers within construction site equipped with medicines and other basic facilities; • Contractor shall hire medical personnel to train and treat workers on first aid during medical emergencies; • First aid kits are adequately stocked; • Information and awareness of communicable diseases, COVID-19, HIV/AIDs, shall be provided to workers; • Provision of masks and sanitizers	Oligoling	reports Corrective action reports	cost	Contractor	UNOPS, WB

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
Child labour	Children under the age of 15 years are prohibited from working. Youth workers of age between 15-18 have some work restrictions	 The Contractor shall only hire workers over 18 for hazardous work, including construction. The Contractor shall not hire any labour less than 15 years of age. The Contractor shall not engage youth workers (ages 15—18) and perform dangerous works. Age verification shall be conducted upon hiring. The labor registry for all workers shall be maintained including the age information. All workers deployed shall be governed by labour management procedure (LMP). 	Ongoing	Labor registry for each site with age verification	Own	Contractor	PIU, UNOPS, WB
Incidents	If incidents are not investigated and root causes are not identified, there is a risk that they may	 The contractor shall investigate all incidents related to environment (e.g. oil spills, bitumen pollution), social (e.g. nonfunction GRM, and OHS (e.g. injuries). The Contractor is obligated 	As and when necessary Within 48 hours of occurrence to report to	Incident reports Root-cause analysis reports	Own	Contractor	PIU, UNOPS, WB

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
	repeat.	to report any serious incident immediately to the PIU, which in turn will report the incident to the World Bank (within 24-48 hours of occurrence).	PIU				
Community exposure to construction hazards	Community (residents and workers) are exposed to construction hazards	 Contractor shall barricade the work areas with hard fencing, particularly at nigh time to prevent entry of residents and drivers in the construction areas. The Contractor shall place adequate signboards to divert residents and drivers away from the construction works. The contractor must train and regularly brief the drivers on best practices on avoidance traffic accidents. Contractor shall also place flagmen to direct the public away from the construction areas. All authorized visitors to the works area should wear basic PPEs such as hard hats, vest and safety shoes. 	Daily SOP	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contractor	PIU, UNOPS, WB

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
Community Exposure to health issues	Possible rise of crime and risk of spreading transmitted diseases from interaction with workers	 Each worker, permanent or temporary, shall sign the contractor's code of conduct. Contractor's code of conduct shall cover program to promote awareness to the construction workers on the risk of spreading of transmitted diseases. Contractor's monthly training program will cover topics on the workers 'code of conduct'. 	of the civil works daily	Signed codes of conduct Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contractor	PIU, UNOPS, WB
COVID-19 transmission	Workers and the neighboring communities are exposed to the risk of COVID-19 transmission.	• Take precautionary measures to minimize the transmission of COVID-19 at work place in line with the WB guidelines (such as regular handwashing, daily temperature check, social distancing, frequent disinfection of common areas/tools, holding meetings/training at openspace.).	Daily	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contractor	PIU UNOPS WB
GBV risks	Communities, especially	PIU to identify existing GBV service providers in	Daily SOP	GRM reports	Own costs	Contractor PIU	Contractor PIU

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision
							Monitoring
	women, girls	Garowe (such as local			(by		UNOPS
	and children	hospitals, CSO groups,			contract		WB
	living around	local specialized			or) and		
	project sites	institutions)to establish the			PIU/PC		
	are at risk for	referral mechanism.			U		
	different	• The GBV specialist to be			project		
	forms of	hired at the federal level			cost		
	gender-based	will support the Garowe					
	violence.	PIU in establishing GRM					
		channel to address GBV					
		cases.					
		Contractors should have					
		sexual harassment policies					
		and worker's Code of					
		Conduct, including specific					
		prohibitions against					
		GBV/SEA.					
		Prior background check for					
		contractors should be					
		1 1					
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		_ -					
		l —					
		undertaken to assess whether sufficient capacity (i.e. action plans, staff with appropriate technical skills and experience) for GBV/SEA risks prevention and management are in place. GBV related training and awareness-raising for					

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
		workers. GRC should be established to track and solve complaints related to GBV/SEA by ensuring confidentiality. Contactors adheres implementation of GBV action plan, which is enumerated in the Social Management Plan (SMP) for the project interventions in Garowe, a copy of which is available at the municipality offices.					
Traffic and road safety	Transport of materials from contactor's main site to construction sites will happen frequently, and during	 The Contractor shall implement a 'Traffic Management Plan' approved in the C-ESMP. The Contractor shall avoid peak rush hours for transport of material. The Contractor shall place traffic signs and flagmen at required places to control 	Daily SOP	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contractor	PIU, UNOPS, WB

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 $^{^{6}\}text{Please}$ check out the website of the Garowe municipality for more details on the SMP

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision Monitoring
	these days, the increased traffic use of the road by construction vehicles will affect the movement of normal road traffics and the safety of the road- users.	 the traffic. The Contractor shall employ trained drivers and regularly conduct refresher training and inspect vehicle safety. The contractor shall conduct regular and timely (prior to construction) sensitization with the communities (including at sensitive receptors). 					DW
Emergency preparedness and response	Emergency at worksite results from the natural and manmade hazards, typically in the form of fire, explosions, leaks or spill.	 The Contractor shall prepare an emergency preparedness and response as part of C-ESMP. The Contractor shall train the workers on emergency evacuation from sites in case of fire, explosions, etc. The Contractor shall have adequate fire extinguishers at the work site, and all site supervisors shall be trained with the operation of extinguishers. The Contactor shall have 	Ongoing	Monthly report by contractor and Site inspection report by PIU and supervising consultant	Own	Contactor	PIU, UNOPS, WB

ESHS Impact	Description	Mitigation Measures	Frequency	Indicators	Budget	Responsi	bility
	of the Impact				(USD)	Implementation	Supervision
							Monitoring
		adequate spill kits for					
		control of oil spills and					
		leaks.					

OPERATIONAL STAGE

After the completion of roads construction works and the defects notification period, regular maintenance work will involve repairing of the pavements, maintenance of road safety features, such as pavement markings, drainage, etc. Environmental and social risks and impacts are not expected to be of major concern during the road's operational stage. However, a few significant direct environmental and social impacts are predicted during this stage, particularly related to the safety issues of the residents. In addition, increased storm-water runoff may occur as a result of pavement strengthening and reduction in infiltration rates. The details of mitigation measures, including the frequency and estimate budget will be supported through the technical assistance of the SURP II (component 2).

Environmental and Social Risks and Impacts	Description of the Impact	Mitigation measures	Indicators of reference for monitoring	Responsi bility
Emission increase locally but surface dust reduced	Negative and positive	Vehicles used in the operations to be well-services to reduce emissions Dampening of the road daily	Visual inspection and road maintenance	GM
Traffic safety	Negative and positive	Traffic calming measures including speed humps to be erected Traffic signage to be posted prominently Road safety awareness campaigns to be conducted	Traffic calming measures and enforcement of traffic regulations	GM
Blocked drains; gravel repair materials	Positive	Routine unblocking of clogged drains by GM	Routine maintenance records	GM
Alternation of natural flood cycles	Positive	Stormwater drains to be constructed	Monitor rainy seasons and flash flood occurrence	GM
Economy improves, local business opportunities increases	Positive		Monitoring and consultation	GM
Noise, nuisance, accidents	Negative	The project will develop a set of sensitization materials for use by the	M&E data collection	GM

	gazarnmant	
	government	
	8	

INSTITUTIONAL ARRANGEMENTS AND RESPONSIBILITIES

The institutional arrangements and responsibility in this ESMP reflect a discussion of the environmental and social management structure and activities that will be undertaken as part of overall project implementation.

The roles and responsibilities of various institutions in undertaking these activities are then defined, include identification of the institutional strengthening activities that will be required to allow those organizations to fulfill their nominated roles and responsibilities. The environmental monitoring program has been prepared and the cost associated with its implementation has been identified. The roles and responsibilities of the proponent and the institutions are identified in table 5.1 as following:

Table 5.1 Responsibilities for environmental and social management plan and monitoring

-	posisionates for environmental and social management plan and montoring				
INSTITUTION	RESPONSIBILITIES				
Garowe Municipality – Project Implementation Unit (GM-PIU)	 Maintain staffing to include Environmental and Social Safeguards Specialist. The E&S Specialist will be responsible for ensuring the implementation of this ESMP and SEP, as well as other ESF instruments, including the LMP and the RAP. 				
	• The E&S Specialist will be provided with necessary facilitation to access the project sites as and when required.				
	• The E&S Specialist will work in close partnership with staff from the Garowe Municipality, other PIU members, as well as have close working relationship with the UNOPS team supporting the project, especially the focal point for management of environmental and social risks.				
	• Ensure that ESMP provisions and other project plans as applicable (LMP, SEP, RAP, SMP) for all SURP II for Garowe are implemented to mitigate environmental and social impacts to acceptable levels.				
	• Ensure that Project complies with WB's ESF standards and government laws and regulation.				
	• Ensure that environmental and social plan and mitigation measures in the ESMP are incorporated into the detailed design.				
	• Ensure that requisite measures from ESMP are incorporated into the bid and contract documents.				
	Undertake environmental and social management capacity				

Ministry of Environment, Agriculture and Climate Change	 building activities for GM and orientation and awareness training for contractor. Facilitate resolution of affected peoples' concerns, complaints, and grievances about Project's environmental and social performance. Undertake monitoring of the implementation of the ESMP (mitigation and monitoring measures). Prepare quarterly environmental and social monitoring reports for submission to WB. Develop a GBV action plan, including identification of project risks and key mitigation measures. After project completion, the Municipality of Garowe will be in charge of the operation and maintenance of the project roads. Routine monitoring will be undertaken by the Department of Public Works at Municipal level. Ensure that the project complies with government laws and regulations.
(MoEACC)	
Ministry of Public Works (MoPW)	 Oversee project implementation process in compliance with quality and standards. Ensure effective coordination and collaboration among stakeholders.
Contractor	 Implement this ESMP and other project plans as applicable (LMP, SEP, RAP, SMP) for all SURP II construction activities in Garowe. Prepare the CESMP before commencement of civil works and submit to PILL for approval.
	 Participate in the induction training on ESMP provisions and requirements delivered by the PIU. Ensure that all workers, including site supervisors and management to participate in training sessions delivered by PIU. Maintain a record of training and conduct awareness sessions for staff to ensure compliance with environmental, safety and contractual obligations including the approved CESMP, Based on the results of CESMP monitoring, cooperate with the PIU and UNOPS' Supervision Consultant to implement environmental and social corrective actions and plans, as

necessary,

- Respond promptly and efficiently to requests and instructions from PIU for environmental corrective actions and implement additional environmental and social mitigation measures, as necessary,
- Coordinate with PIU to deal with any complaints during project implementation,
- Require each worker to sign a code of conduct.
- Collaborate with the local government to follow project agreements on material sourcing, schedules for utility disruption, work schedules and waste utilization plan.

Supervision Consultant

- Provide day to day construction supervision for civil works as well as monitoring adherence to the safeguard's instruments related to environmental, occupational health and safety,
- Oversee the performance on labor and working conditions on daily basis on behalf of the PIU, including identification of potential existing significant OHS or environmental risks due to the project that are not adequately mitigated.
- Have a social /environmental specialist in the team with GBV specific skills to supervise issues related to GBV (e.g., supervise signing of Codes of Conduct (CoCs), verify working GRM for GBV is in place, refer casees where needed) and work with GBV Services Providers as entry points into service provision to raise awareness of the GRM,
- Submit routine reports related to project ESHS performance every quarter.

STAKEHOLDER ENGAGEMENT PLAN

5.1 STAKEHOLDERS OF THE PROJECT

Garowe Municipality has a broad range of stakeholders, who directly or indirectly depend on the City and are being affected by the road rehabilitation activities. These stakeholders are broadly categorized into the following categories in accordance with ESS 10 – Stakeholder Engagement and Information Disclosure and the SEF for SURP II:

Project-Affected Parties: Stakeholders that has assets or business activities along the
roads can be categorized as 'project-affected stakeholders'. They include people who
reside or have structures in the RoW, street vendors, vehicle drivers and businesses
operating along the project roads. Specifically, these are people who are physically or
economically affected by the project.

Table 6.1 PAPs

Project-affected	Relevance to the project	Indicative list
parties	recevance to the project	indicative list
People who are physically or economically affected by the project	 The project has affected physical properties of 11 households due to their encroachment of the RoW. The number of persons in the affected households are 43. There will be no physical displacement or resettlement; however, there will be disturbance during rehabilitation of their structures and/or buildings. 	 People who reside along the roads and occupied the RoW. Street vendors, taxi drivers and businesses operating along the roads.
People who will benefit from project-related employment or business opportunities.	The project will generate employment or business opportunities for the community through construction and maintenance works of the municipal infrastructure.	 Disadvantaged/vulnerable groups in the community such as IDPs, refugees and returnees who will be engaged by the project; Local business community who will benefit from project construction.

• Other Interested Parties: These are government institutions (e.g. MoPW, MoEACC), private companies, international, and national organizations with an interest in the project.

Table 6.2: Other interested parties

Other interested parties	Relevance to the project	Indicative list
Local government	• Local government authority protects the right of communities in the project areas and represents the interest of the PAPs under SURP II.	 Municipality Departments (e.g. Public Works, Social Affairs, etc) Members of Local Council
Line Ministries and Agencies	• Ministries such as Public Works, Environment, and other line agencies are key stakeholders for the project in compliance with legislation and regulations	MoPWMoEACC
UN Agencies, INGOs and donor groups	UN agencies, INGOs and donor groups in Somalia supporting the government with similar projects on service delivery as well as economic and infrastructure development. There is need for collaboration and partnership with SURP II.	 UNDP; UN-HABITAT; UNOPS; IOM; UNHCR; UNICEF; ILO; WFP; UN WOMEN; NRC; WVI; DRC; EU; USAID; and DFID
Community groups	• There are community groups including IDPs and host communities who are currently working with the Municipality, this will be sustained under SURP II	 Community leaders and elders; IDPS, returnees and refugees; Women and youth groups
Other key interested partners	Private companies such as electricity, telecommunication and water supplies. These are key stakeholders during the implementation of the project.	NUWACO;NECSOM;GOLIS;SOMTEL

• Vulnerable and Disadvantaged Groups: Disadvantaged/vulnerable individuals and groups are those who may not have voice to express their concerns or understand the impacts of the project, sometimes excluded from stakeholder engagement. Internally

Displaced People (IDPs), persons with disabilities, widows, IDPs, refugees, orphans, and elderly with no means of living and households with disabled members, affected by the project are entitled to allowance. After conducting focus groups during the RAP survey with PAPs along SURP II roads their worries and concerns were included in the report and subject for implementation by the local authority.

Table 6.3: Vulnerable and disadvantaged groups

Vulnerable groups	Potential barriers to limit effective stakeholder	Specific needs to address the barriers
	engagement	
IDPs, returnee and refugees	Access to IDP camps;	Sensitization through their
	Limited understanding or	representatives
	interest	Organize meeting with their
		representatives
Poor households such as	Lack of time to participate	• Flexible timing for meetings
female-headed households	• Lack of transportation cost	• Provision of transports cost
and elderly people		
People with disabilities	Physical disabilities	Sign language
	preventing mobility	• Ensure other family
	• Various disabilities (e.g.,	members or relatives
	visual, hearing, etc.)	accompany during meetings
		Accessible consultation
		venues

5.2 CONSULTATIONS FOR THE PROJECT

The initial phase of the preparation of SURP II Safeguard instruments, stakeholder consultation workshop was held on 7-8 August 2019. Subsequent to this first round of consultations which is documented in the SEF, other rounds of consultations for this ESMP/SEP were conducted on October 21, 2020 and again between November 23 and 24, 2020. A number of stakeholders were consulted on the new WB's E&SF and Standards, revised SURP II safeguard documents (ESMF, RPF, LMP and SEF) as well as the proposed roads, associated concerns and impacts on the people. The stakeholders consulted included the following:

- Ministry of Environment, Agriculture and Climate Change (MoEACC)
- Ministry of Public Works (MoPW)
- UNOPS
- PAPs
- Private Companies (i.e., NECSOM, NUWACO, Golis, etc.)
- Village Committee Representatives including IDPs

- Women and Youth Associations
- University graduates

The specific objectives of the consultations were to (a) present and explain relevant project information to stakeholders, and (b) brief the stakeholders on ESMP/SEP preparation process and document any concerns/issues. The PIU used phased approach during the stakeholder consultations as a way to reduce community transmission of COVID-19 in Garowe.

A consultation meeting was held on the October 21, 2020 with representatives from the residents including PAPs that are directly or indirectly affected by project. The second phase of consultation was one-on-one and telephone conversations and discussions to engage stakeholders (i.e. private companies and government institutions). A total of 27 (7 female) participants from different stakeholders took part in the consultation. The different consultation strategies enabled the PIU to get additional inputs that are useful for better implementation of the ESMP/SEP. During the face-to-face consultation meetings and discussions, PIU team used face masks and assured physical distancing as a mitigation measures for the virus among the stakeholders.

During the consultation meetings, PIU highlighted the scope of the roads construction interventions under SURP II, different aspect of the ESMP/SEP and the need for community consultation in order to deliver the project in an environmental and socially sustainable manner. The summary of the deliberations of the consultation meetings are provided in the table in the next page.

Table 1.1: Key Issues and Responses from Stakeholders Consultation

No	Main issues raised	Issues raised by	Initial clarifications/responses
1	Impact of the Project on properties and structures	Representatives from Waberi, Hanti-wadag, Halgan villages	According to the Resettlement Action Plan (RAP) for SURP II, some of the properties/structures of 11 households will be partially damaged and Municipality and PAPs agreed on compensation of affected structures and ready for implementation prior to the civil works commencement.
2	Impact of the Project on road safety for the resident	Representatives from Waberi, Hanti-wadag, Halgan villages	The contractor will provide road safety awareness campaigns (via local radios) for the residents in the project sites.
3	Impact of the Project noise and vibration on households	Representatives from Waberi, Hanti-wadag, Halgan villages	The conditions of the machines and equipment of the contractor will be monitored and will be used at appropriate time in order to mitigate noise during resting hours of the day.
4	Project employment opportunities for communities	Representatives from Waberi, Hanti-wadag, Halgan villages	Communities both host and IDPs will be given much consideration for project employment opportunities. Conditions under Labour Management Procedure will be executed.

5	Impact of the Project on rain water flow and might cause water stagnation in neighborhoods	Representatives from Waberi, Hanti-wadag, Halgan villages	During the preparation and review of detailed feasibility and design study, appropriate design for the roads that was approved by the various engineers from both PIU and World Bank will be executed accordingly. The design of the roads will enable rain water to drain
6	Impact of Project on utilities infrastructure	Representatives from Waberi, Hanti-wadag, Halgan villages and utilities providers	Relocation and repairing of utilities infrastructure will be managed with close collaboration with private companies (i.e., NUWACO for water and NECSOM for electricity) and Municipality. NUWACO informed the PIU on their plan to install big water pipe at one of the project sites (30th Street). PIU informed the company to dig the trench across the road and deeply bury (one meter deep) the pipe in order to avoid any damage in the future.
7	Does the ESMP in- line with government policies and regulations?	Ministry of Environment, Agriculture and Climate Change	The plan is built-on the existing government policies and regulation in relation to environmental protection. However, since the government policies are inadequate yet in terms of proper execution, the plan adopts applicable standards for WB's environmental and social standards. In addition, the plan proposes mitigation measures that will be taken all over project stages in order to minimize risks.

Summary of consultations

Generally, the stakeholder consultation meeting and discussion indicated that SURP II will not severely affective negatively on the existing environmental, social and other conditions of the people, locally. Stakeholders particularly community representatives that were consulted had positive attitude towards the project. The residents were particularly happy that the long-existed gravel roads will be upgraded and the see it as a job creation opportunity for youths and other workers in the city.

In the future, the recommendations include the following:

- Community members sensitized and duly informed on the time and duration of works through consultations;
- Priority should be given to local workers during the construction phase. This would reduce social problems at the community level;
- Carry the community along during project implementation and mobilize them to provide community security for personnel working on site;
- Construction works is carried out in an environmentally sustainable and socially responsible and inclusive manner.

5.3STAKEHOLDERENGAGEMENTPROGRAM

Stakeholder engagement activities will be on-going through the whole project life cycle (preparation, construction and operation). The nature and frequency of follow-up consultations will depend on the subprojects. Before starting of the Project, affected parties will be informed about the Project's scope and contact information which they can address for further information. Also they will be informed about the availability of the public available information at the Municipality's public relations office, website and social media.

Key communication principles are to:

- Keep the community and key stakeholders informed in advance of project progress;
- Encourage community participation; and
- Listen to feedback, investigate suggestions and adopt them where possible.

PIU is responsible for regularly communicating with the stakeholders through the following of mechanisms:

• Monthly Meetings: PIU will carry out monthly meetings with key stakeholders, such as PAPs, representatives of interested parties and vulnerable groups. These meetings will be used for sharing the Project related construction plans and receive their feedback.

In case on the COVID-19 pandemic spreading continues during 2020-2021, the project will practice more virtual and social distancing methods to consult and engage with stakeholders to minimize COVID-19 transmission risks during stakeholder engagement processes. The below

Stakeholder Engagement Action Plan will be updated respectively during the project implementation to reflect the social distancing practices. The SEP and its summary translation in Somali language will be disclosed in country and on WB website. The List of the stakeholders will be continuously updated and incorporated in the SEP during the project implementation.

Table 6.4: Stakeholder engagement action plan

Project Stage	Target	Topic (s) of	Method (s) used	Location/frequency	Responsibilities
. .	Stakeholders	Engagement		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
ESF instruments	Project Affected	Site-specific	Public meetings,	Prior to start of civil	PIU and Engineering
preparation and	Parties-People who	environmental and social	individual meetings	works at project sites	and Supervision
implementation;	are physically or	impact and mitigation	during preparation of		Consultant;
Detailed Design	economically	measure; Awareness-	RAP, Disclosure of		GM;
	affected	raising on health and	written information –		Contractor
		safety measures;	website,		
		Compensation and	Information board – at		
		methodology; Project	the beginning and at		
		scope and rationale;	the end of project sites;		
		Grievance mechanism	Grievance mechanism		
		process	Communication		
	Project Affected	Selection criteria and	through mass media.	Prior to start of civil	DILL on 4 En ain a suin a
	Parties-People who	ToR for employment	Group meetings with the lost community and	work	PIU and Engineering and Supervision
	will benefit from	opportunities for road	support groups to	WOIK	Consultant;
	employment	construction work;	engage vulnerable		GM;
	opportunities	Environmental laws and	groups;		Contractor
	opportunities	regulations;	groups,		Contractor
		Project scope, rationale			
		and E&S principles			
		Grievance mechanism			
		process			
	Other Interested	Ways to outreach to	Individual meetings;	Prior to start of civil	PIU and Engineering
	Parties –	vulnerable groups and	Focus group meetings;	work	and Supervision
	Community groups	address their concerns	Emails		Consultant;
		and interest			GM;
					Contractor

Project Stage Target		Topic (s) of	Method (s) used	Location/frequency	Responsibilities
	Stakeholders	Engagement			
Construction	Project Affected Parties - People who physically and economically affected, those residing in project area	compensation rates and methodology; livelihood restoration) Grievance mechanism process; Health and safety impacts (Construction-related safety measures); Employment opportunities; Environmental concerns; awareness-raising	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; Disclosure of written information Information board – at the beginning and at the end of project	Monthly/quarterly meetings Communication through mass/social media (as needed)	PIU and Engineering and Supervision Consultant; GM; Contractor
Post-construction and Operation phase	Project Affected Parties - People who physically and economically affected, those residing in project	Monitoring and evaluation of project benefits and environmental and social performance Satisfaction with engagement activities; Grievance mechanism process; Community health and safety measures during operation; compensation and completing rehabilitation of physical assets; Information traffic safety measures (traffic signs, lights, traffic calming measures, etc.)	End-line beneficiary survey on project impact Public meetings, trainings/workshops, individual outreach to PAPs Disclosure of written information - Information board – On the beginning and at the end of project side; Awareness raising activities on traffic safety	Following the completion of civil work	PIU and Engineering and Supervision Consultant; GM; Contractor

5.4GRIEVANCE REDRESS MECHANISM

The implementation of the ESMP could generate complaints and grievances. A Grievance Redress Mechanism (GRM) provides the means for any person or household aggrieved or dissatisfied with any activities related to the implementation of this ESMP and SEP or general project activities. The core of GRM is therefore to ensure PAPs have the avenue for seeking redress to a concern⁷.

This is in line with the requirement of the WB's Environment and Social Framework (ESF) that all project resettlements incorporate a GRM that is accessible, free, easily understood, transparent and effective. The PAPs were not only informed of the formation or existence of a GRM for the stated purposes, but were involved in selected people to represent them, at the consultation and negotiation meetings.

Grievances and/or comments related to SURP II can be submitted through grievance channel details that are shown below. Anonymous grievances will be allowed to be raised and addressed.

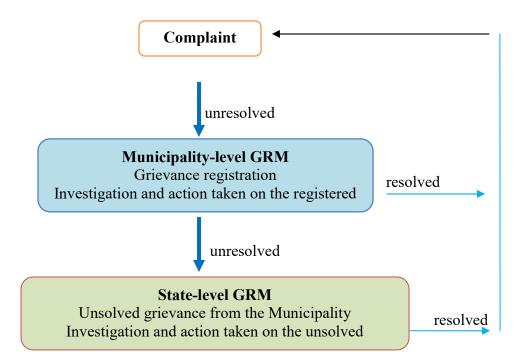
Email address:	mgure.suipp@plstate.so
Telephone number (s):	+252 (0) 907 790575
	+252 (0) 907 747496

In regard to appeal process, SURP II adopted two-tier grievance systems in place at municipality and state level, as illustrated in the following chart. The members of Grievance Resettlement Committee (GRC) are revealed below.

- GM-level GRM (Tier 1 GRM): A grievance redress committee (GRC) was established at the municipal level which consists of representatives from the PAPs, women and youth groups, elders, religious leaders and representatives of the municipality (esp. the director of social affairs department, director of public works department and the executive secretary of the municipality). PIU and the engineering, contractor and supervision consultants where relevant can support and attend meetings.
- State-level GRM (Tier 2 GRM): The state-level GRM will address unsolved grievances at the municipality-level GRM. The state-level GRC will be comprised of the

⁷As per ESS2 (Labor and Working Conditions), the Labor Management Procedure (LMP) provides a separate grievance mechanism that will be established for project workers (direct workers and contracted workers). This is designed to specifically address workplace grievances, such as demand for employment opportunities; labor wages rates and delays of payment; disagreement over working conditions; and health and safety concerns in work environment. These worker GRMs will be managed by respective employing entities (PIU, UNOPS and contactor(s)).

representatives of municipality (esp. the Mayor), the PIU, the engineering and supervision consultant, and the representatives of the aggrieved PAPs or communities.



GRCs across the levels will manage and process grievances by following the steps shown below with timeframe.

#	Steps to address grievance	Suggestive Timeline	Responsible body
1	Register and appreciate complain in written format	Within one day	Municipality-level GRC supported by PIU/engineering and supervision consultant
2	Screen the basis of the registered grievance	Within three days	Municipality-level GRC supported by PIU/engineering and supervision consultant
3	GRC to consider ways to address the complaint	Within three days	Municipality-level GRC supported by PIU/engineering and supervision consultant
4	Implement the case resolution or the unsatisfied complainant can see redress with the appeal process	Within four days	Municipality GRC or State- level in case of appeal

5	Document the grievance and	Within five days	Municipality-level GRC
	actions taken and submit the		supported by PIU/engineering
	report to PIU		and supervision consultant
6	In case of no resolution reached,	Anytime	Complainant
	the complainant has the right to		
	take his/her case to the State-level		
	judiciary system (civil court for		
	litigation)		

5.5SEXUAL EXPLOITATION ABUSE (SEA) AND GENDER-BASED VIOLENCE (GBV) GRM SYSTEM

Separate channels to enable safe, confidential reporting of SEA and GBV cases will be developed for community members, as well as for female project workers. Consideration may include development of a separate, standalone GBV/SEA GRM run by a separate entity, such as a GBV services provider. GRM operators will be trained on safe, confidential, empathetic (non-judgmental) and ethical management of reported cases related to SEA and GBV cases, as well as on appropriate procedures for data collection, information sharing and response.

MONITORING INDICATORS

6.1 ESMP MONITORING PLAN

Proposed monitoring plan to be carried out during the implementation of the project to ensure contractor's compliance with the mitigation measures is given in Table 8.1 along with indicators and timeline. The contractor will carry out the monitoring, while UNOPS and PIU will supervise.

Table 8.1 ESMP Monitoring Plan

S.No.	Monitoring	Means of Monitoring	Compliance Indicator	Freq.	Responsible A	Agency
	Activity				Implementa tion	Supervision
1	Workers are trained on ESHS risks and Code of	Inspection of training records and interviews with the workers	100% of workers are trained Regular sensitization sessions	Monthly Daily	Contractor	PIU& UNOPS
	Conduct		conducted			
2	Use of PPE by all workers	Inspection on use of relevant PPEs	100% use of PPE	Daily	Contractor	PIU & UNOPS
3	Licensed and trained equipment operators and vehicle drivers	Visual inspection of driving license	All operators and drivers shall have valid licenses	Monthly	Contractor	PIU & UNOPS
4	Water and sanitation facilities at worksites	Visual inspection and interview	Availability of safe drinking water and sanitation facilities	Monthly	Contractor	PIU & UNOPS
5	First aid kits at worksites	Visual inspection and interview	All worksites shall have adequate first aid kits	Monthly	Contractor	PIU & UNOPS
6	Grievances from labour	Records of grievances registered and resolved	All grievances shall be addressed within 7 days of complaint	Monthly	Contractor	PIU & UNOPS

S.No.	Monitoring	Means of Monitoring	Compliance Indicator	Freq.	Responsible Agency	
	Activity				Implementa tion	Supervision
7	Air pollution	Virtual inspection of equipment/vehicle exhausts and records of maintenance	All equipment and vehicles shall be maintained as per manufacturer recommendation	Monthly	Contractor	PIU & UNOPS
8	Noise and vibration	Virtual inspection of noise control	Controls measures shall be in place for high noise generating equipment	Monthly	Contractor	PIU & UNOPS
9	Waste management	Waste management per the approved plan	Facilities are clean, and waste collection and disposal facilities are in place	Monthly	Contractor	PIU & UNOPS
10	Traffic safety	Visual inspection for traffic management	The smooth flowing of traffic, and placement of traffic signs and flagmen	Monthly	Contractor	PIU & UNOPS
11	Emergency response mechanism	Visual inspection	Fire extinguishers are in place at all work sites.	Monthly	Contractor	PIU & UNOPS
12	Child labor	Inspection of labor registry and visual inspection	Compliance with minimum age requirements	Monthly	Contractor	PIU& UNOPS
13	COVID19	Visual inspection	Implementation of precautionary measures as specified in this ESMP.	Monthly	Contractor	PIU & UNOPS
14	Community sensitization	Interview, paperwork	Community is aware of the risks of the project and the schedule and location of works	Monthly	Contractor	PIU & UNOPS

6.2 CAPACITY ENHANCEMENT FOR THIS ESMP

Capacity building and training would be required especially for the Contractor and PIU staff associated with the project as the Safeguards. The training would not only be project specific but would also target and develop long term capacities in the Environmental and Social Management at various stakeholders. The training programme will be implemented as per training topic provided in Table 9.1. GM's and those of the contract will participate and benefit the various training areas.

The basic objective of giving training to different stakeholder is to enhance their capacities for implementation of Environmental and Social Management and Monitoring Plans. It is recommended that training be given at least three times:

- Before start of construction works;
- During construction; and
- After construction before start of M&O.

Table 9.1Environmental and Social Training Program

S.No	Environmental and Social Aspects to be	Intended Participants	Facilitator (s)
•	covered in training topics		
1	World Bank's Environmental and Social	Staff of GM, PIU, Staff of	Safeguards Specialist,
	Management Framework	Contractor	PIU
2	Legal requirements of the project, ESCP,	GM/PIU, Staff of Contractor	Project Coordinator
	etc.		Safeguards Specialist
3	Garowe Environment and Social	GM/PIU, staff of Contractor	Project Coordinator
	Management Plan and ESCP		Safeguards Specialist
4	Institutional Set Up, Role and	Staff of GM, PIU team,	Project Coordinator
	Responsibility of Stakeholders and	Engineering staff of	Safeguards Specialist
	Contractual obligations	Contractor and Collaborating	
		Gov't Agencies	
5	Supervision and Monitoring, Reporting	GM/PIU, staff of Contractor	M&E Specialist
	Formats		Safeguards Specialist
6	Occupational Health and Safety Community	Staff of GM, PIU team,	Safeguards Specialist
	Health and Safety	Engineering staff of	
	·	Contractor and Collaborating	
		Gov't Agencies	
7	Stakeholder's engagement procedures,	Staff of GM, PIU team,	Project Coordinator
	Grievance redressal mechanism	Engineering staff of	Safeguards Specialist
		Contractor	_
8	Traffic and Safety Management during	All staff of Contractor	Project Engineer
	construction, Safety Practices, GRM	Community	Safeguards Specialist

ESMP IMPLEMENATION BUDGET

The budget for the ESMP will include costs for training and capacity building for relevant staff of the Municipality and Contractor, public consultation meetings, GRC training, etc. The total estimated cost of the ESMP will be USD 6,000 to be covered by SURP II Garowe component. This estimated budget includes the cost for mitigation and enhancement.

Table 10.1 Estimate budget for implementing the ESMP for SURP II

Description	Estimated Budget (US\$)
ESMP familiarization and dissemination	1,000
Public consultation meetings	1,000
GRC training/workshops	1,000
Capacity building and training for GM staff and Contractor	3,000
Costs for implementing the impact mitigation and monitoring plan	TBC
Total	6,000

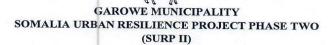
Annex I: Participants list

GAROWE MUNICIPALITY SOMALIA URBAN RESILIENCE PROJECT PHASE TWO (SURP II)

STAKEHOLDER CONSULTATION MEETING ON ESMP/SEP OCTOBER 21, 2020

ATTENDANCE LIST

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STAKEHOLDER CONSULTATION MEETING ON ESMP/SEP NOVEMBER 23-24, 2020

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2	Abdenues Gices	MUW4CO	Director	Asdunur agus	vicos Alpha
7	Haykal Dahir	UNOPS	SAPECWARDS	haypal40@gmail.	
8	Juving Axmed	Ministry of Inte	rior Director	of Local Gov. Yousufl	36 gmelin /s
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Annex II: Lessons Learned from SURP

Key lessons learned during the preparation and implementation of SURP includes:

o Lesson 1: Adoption and implementation of safeguard instruments

Since SURP was the first World Bank financed Project in Somalia and particularly in Garowe in recent years, the application of the Bank's Operational Policies (OPs) were helpful to safeguard the livelihoods and assets of the affected peoples in sub-project areas. Since, there are inadequate laws and regulation at national, state and local levels, the Municipality adapted and implemented the relevant OPs in order to protect the people. Several safeguard instruments (ESMF, RPF, RAP and ESMP) were prepared and implemented. It is important to mention that among the 14 households affected by the project, three of them were vulnerable households and special attention was given to them. Two of them were given additional assistant in terms of business start-up since they were female headed household who initially had shops; while the other one was an old blind man who received medical assistance as his preference for three months.

On June-August 2020, from the local revenues, the Municipality rehabilitated the main road which hosts most of the business community in the city. In this particular project, the municipality used concepts and knowledge learned from the OPs and there was no adverse effect on the environment and social during the implementation. From this case, one can understand the level of adoption of safeguard instruments in other infrastructure project in Garowe.

o Lesson 2: Community Consultation:

Garowe Municipality carried out wide-ranging consultation meetings with the residents under the SUIPP in 2016. Through consultation meetings, residents' prioritized improvement of the city infrastructure mainly roads in order to boost local income and reduce poverty. Then, the leadership of the municipality presented the priority area to the local council of the city and then the council approved 19 roads within the city that require rehabilitation/construction for SURP. The PIU with the leadership of the municipality maintained timely consultation meetings and discussions with affected persons throughout census of PAPs, inventory and documentation of assets of the PAPs, determination and negotiations of the compensations and inclusion of PAP's representatives in the GRC. In addition, such spirit continued during the development and execution of ESMP. As a result of community consultation throughout the project lifetime allowed the municipality to successfully meet the goals and objectives of the SURP.

Lesson 3: Disclosure of project-related information

A summary of project-related information and documents which were translated into Somali language were public disclosure through local media and accessible locations (e.g. municipality office) of the city. This enabled the local people to understand better the objectives of the project and its plans to sustain their physical properties, environment and social aspects. This means sharing information among the stakeholders cultivated transparent and accountability of the local authority.

Lesson 4: Close collaboration among stakeholders

There was strong collaboration between the municipality (PIU), Contractor and other project involved stakeholders. For instance, the utilities providers and telecommunication companies (NUWACO, NECSOM, Golis and SOMTEL) respectively were closely collaborating, coordinating and sharing information on mapping water pipelines, electric poles and fiber optic cables installed along project sites. Joint coordination among these stakeholders including the municipality facilitated to provide dedicated team to work with the Contractor at the site for guidance and restoration of properties when damage occurs during road-bed preparation (cut and fill) stage.

Lesson 5: Establishment of GRC

During the implementation of the RAP, the Mayor of Garowe Municipality established grievance redress committee (GRC) that consisted 11 members who addressed all grievances and issues related to rehabilitation of building and structures. After the successful implementation of the RAP activities which was a fundamental stage for the project, the committee members were mostly volunteers (involved in private or public duties) requested that the Municipality to continue to handle grievances related to safeguards during the execution of civil works. Therefore, municipality staff such as village committee representatives who were part of the GRC, PIU team with the contractor handled grievances, issues or concerns during the implementation of SURP.

Lesson 6: Labour Management Plan

PIU used labour registration forms which was capturing basic information of the labour. However, PIU found that the there is need to improve the labour registration forms in order to capture new information such age of the worker, contact details, etc.

• Lesson 7: Availability and proper use of PPE

There were inadequate PPE supplies for the site workers at the beginning of the civil works. PIU discussed the issue related to PPE with the Contractor. However, when the PPE were given to the workers, we found out that they were not regularly and properly using it and then PIU, UNOPS and Contract started to sensitize the workers on the

benefits of using the items. Early morning briefings for the workers and bi-weekly toolbox talks were perfect times to advise and instruct the workers to use the PPE to avoid any risks associated the nature of work that they are doing.

Annex IV: List of public consultations for SURP II

	Participants list for Garowe Public Consultation Workshop on Safeguard Instruments (ESMF, RPF, SEF and LMP)					
S/n	Full Name	Gender (F/M)	Organization/Location	Title	Phone Number	
			Garowe Municipality			
1	Halima Abdulkadir Barre	F	Garwe Municipality	Director of Gender Affairs	907747884	
2	Muna Mohamud Elmi	F	Garwe Municipality	Sanitation Unit Officer	907662246	
3	Mustafe Ibrahim Rabah	M	Garwe Municipality	Public Works Dept	907634999	
4	Abdiweli Ismail Yusuf	M	Garwe Municipality	Director of Social Affairs	907748196	
5	Habib Abdidahir Hirsi	M	Garwe Municipality	City Council Member	907767367	
6	AbdiKarim Aden Hussein	M	Garwe Municipality	City Council Member	907768123	
7	Jama Said Adan	M	Garwe Municipality	City Council Member	907747579	
			Ministries			
8	Abdullahi Dahir Said	M	Ministry of Environment	Environmental Education	907709660	
9	Deko Jama Isse	F	Ministry of Labour	Director of Youth	907743535	
10	Mohamed Murshid Mohamed	M	Ministry of Public Works	Engineer	907715518	
11	Mohamed Abdulahi Yusuf	M	Ministry of Planning	Aid Coordinator	907768472	
			IDPs			
12	Mohamed Abdi Ali	M	Jilab 1 IDP Camp	Camp Coordinator	907724053	
13	Abdirashid Garane	M	Jilab 2 IDP Camp	Resident	907787616	
14	Fowsio Nur Badel	F	IDPs Camp	Resident	907235620	
15	Muhubo Mohamed Haji	F	IDPs Camp	Community Health Worker	907373392	
	Utility	Service Pr	oviders (water, electricity,	telecommunication)		
16	Abdirisak Mohamed Ismail	M	NECSOM	Deputy CEO	907745959	
17	Said Sayte	M	Golis	Public Relations Officer	907792466	
18	Mohamed Nur Mohamud	M	NUWACO	Engineer	907672994	
		P	rivate Construction Compa			
19	Mohamed Khalif Mohamed	M	PCC	Liaison Officer	907747011	

20	Ibrahim Hassan Barre	M	Aw-Mohamed CC	Company Manager	907740154
21	Abdiwahab Abdiweli Ismail	M	TCC	Supervisor	906749818
			Women and Youth		
22	Lul Jama Aw-Nur	F	Women Association	Community Mobilizer	907787783
23	Lul Jama Samatar	F	Women Association		907740053
24	Farhia Ali Nur	F	Women Association		907743593
25	Abdulkadir Elmi Hassan	M	Youth Association		907762272
26	Abdullahi Abdi Jama	M	Youth Association		907742745
27	Abdulahi Ali Gani	M	Youth Association		907726182
			Religious and Traditional l		
28	Mohamud Ahmed Farah	M		Religious leader	907756597
29	Abdikarim Ali Mohamud	M		Traditional elder	907787107
			Village Representative	es	
30	Maryan Abdi Jama	F	Halgan Village	Committee member	907362664
31	Fartun Ahmed Mohamed	F	Horseed Village	Committee member	907749422
32	Abdulahi Mahdi Abdi	M	Israac Village	Community Mobilizer	907384803
33	Hinda Abdi Ali	F	Wadajir Village	Committee member	907634814
34	Jurmi Abdikadir Adur	F	Hodan Village		90743393
35	Basharo Said Ahmed	F	Waberi Village	Committee member	907701526
36	Abshir Abdulahi Aden	M	Hantiwadag Village	Deputy Chairlady	907743731
37	Bashir Abdulahi Hussein	M	1da August Village	Deputy Chairman	907772437
			Higher Education Institu		
38	Abdulkadir Mohamed Mohamud	M	EAU	Student	907787023
39	Jama Abdalla Hersi	M	EAU	Student	907774737
40	Mohamed Abdiaziz Ali	M	EAU	Student	907335525
41	Abdullahi Dahir Said	M	PSU	Student	907746477
42	Muhubo Mohamud Aden	F	PSU	Student	906224697
			People with Special Nee	eds	
43	Sacdia Khalif Mohamud	F	Puntland Disability As.		907743260

Annex V: Template for Incident Reporting

This should be used for reporting of incidents occurred during the construction stage of the project.

No.	Required information of incident reporting	Give the details
1	Country and State	
2	Name of the Project	
3	Name of Project Coordinator and Environmental and Social Specialist	
4	Preliminary classification of the incident	Indicative Serious Severe
5	What is the incident?	
6	What actually happened? To what or to whom?	
7	Where and when did the incident occur?	
8	How did we find out about it and when?	
9	Are the basic facts of the incident clear and uncontested, or are there conflicting versions?	
10	What are those versions?	
11	What were the conditions or circumstances under which the incident occurred (if known at this stage?)	
12	Is the incident still ongoing or is it contained?	
13	Is loss of life or severe harm involved?	
14	What measures have been or are being implemented?	
15	Has anyone in the PIU or other government agencies been informed? If so, how specifically? What has response to date been?	

Annex VI: Site Inspection Form⁸

Road name/Location Inspected:	Date:	Time:

No.	Item	Yes	No	Comments
Work Health and Safety				
1	Is the work site tidy and well arranged?			
2	Have workers received basic OHS training?			
3	Is there routine work safety meetings?			
4	Are workers wearing the right and full PPE?			
5	Are workers trained for safe operation of machines and tools?			
6	Are clear safety signs in place e.g. PPE, no smoking near flammables?			
7	Are clear signs in place about GBV/SEA risks and reporting options?			
8	Do workers work beyond normal working times?			
9	Are members of the communities passing by on construction site protected from work risks?			
10	Are Fast Aid facilities in place and their locations known by workers?			
11	Are there measures in place to prevent and manage fire?			
12	Are overhead or buried electrical live wires secured by authorized personnel?			
13	Are armed security guards on site?			
14	Is an Emergency Response Plan in place?			
	Environmental Pollution (air, noise, water	r and s	oil)	
15	Do workers trained on environmental pollution prevention measures?			
16	Do construction vehicles and machines regularly maintained?			
17	Do construction vehicles and machines excessively emitting air pollutants?			
18	Are there measures in place to control dust on site e.g. watering dusty roads, covering trucks carrying soil?			
19	Is working time between 7am –5pm adhered?			

⁸This form will be used by the Environmental and Social Safeguards Specialist working with the Garowe municipal council

No.	Item	Yes	No	Comments	
20	Do construction vehicles and machines run idle?				
21	Do workers sensitized on noise control measures?				
22	Are chemicals and oils containers labeled and stored properly?				
23	Are there measures in place to prevent and control chemical and oil leaks/spill by				
	construction vehicles, machinery and storage tanks?				
	Waste Management		1		
24	Are Sanitary facilities such as toilets and wash rooms provided for both male and				
	female workers?				
25	Are adequate and separate bins for different wastes available on site?				
26	Are recycling bins available on site?				
27	Are construction and campsite waste collected regularly and disposed at BM				
	approved site?				
	Road Safety				
28	Do contractor drivers get awareness on safe driving and road safety?				
29	Do contractor drivers undergo routine drug test?				
30	Is traffic management plan in place?				
31	Is the public notified on road closures?				
32	Is the public provided with alternative traffic routes during road closures?				
33	Are clear and appropriate road safety signs in place?				
34	Are pedestrian walkways clear of construction materials?				
35	Are there traffic speed control measures in place?				
Other Site Hazards/Issues					
Inspected by:					
Title:	Title: Signature:				

No.	Itam	Yes	No	Comments

Annex VII: Guidelines for Construction Workforce Implementing SURP II Project in Garowe

The Garowe Municipality and its partner, the World Bank, are committed to protecting the health and safety of the construction workers on SURP II sub-project sites in Garowe. When working in the construction industry, the following tips can help reduce the risk of exposure to the coronavirus:

- Encourage workers to stay home if they are sick.
- Allow workers to wear masks over their nose and mouth to prevent them from spreading the virus.
- Continue to use other normal control measures, including personal protective equipment (PPE), necessary to protect workers from other job hazards associated with construction activities.
- Advise workers to avoid physical contact with others and direct employees/contractors/visitors
- Advise workers to increase personal space to at least six feet, where possible.
- Where work trailers are used, all workers should maintain social distancing while inside the trailers.
- Train workers how to properly put on, use/wear, and take off protective clothing and equipment.
- Encourage respiratory etiquette, including covering coughs and sneezes.
- Promote personal hygiene.
- If workers do not have immediate access to soap and water for handwashing, provide non-alcohol-based hand rubs.
- Where possible, use Government of Puntland-approved cleaning chemicals or that have label claims against the coronavirus.
- To the extent tools or equipment must be shared, provide and instruct workers to use appropriate, effective wipes to clean tools before and after use.
- When cleaning tools and equipment, workers should consult manufacturer recommendations for proper cleaning techniques and restrictions.
- Keep in-person meetings (including toolbox talks and safety meetings) as short as possible.
- Limit the number of workers in attendance and use social distancing practices.
- Clean and disinfect portable jobsite toilets regularly.
- Hand sanitizer dispensers should be filled regularly.
- Frequently touched items (i.e., door pulls and toilet seats) should be disinfected.
- Encourage workers to report any safety and health concerns.

For more information, please contact the Garowe Municipality's team supporting project implementation.