



Galmudug state of Somalia

Ministry of Livestock, Forestry and Range (MOLFR)

Environmental and Social Management Plan (ESMP)

**Construction of the Headquarter Building for the Ministry of
Livestock, Forestry and Range
Dhusamareeb, Galmudug State**

Submitted by:

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Somalia FSRP

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List of Abbreviations and Acronyms

ABBREVIATION/ ACRONYMNS	FULL TERM
BOQ	Bill of Quantities
C-ESMP	Contractor's Environmental and Social Management Plan
E&S	Environmental and Social
EHSG	Environmental, Health, and Safety Guidelines
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FGS	Federal Government of Somalia
GBV	Gender-Based Violence
GM	Grievance Mechanism
LMP	Labor Management Procedures
MOLFR	Ministry of Livestock, Forestry and Range
NPCU	National Project Coordination Unit
SPCU	State Project Coordination Unit
OHS	Occupational Health and Safety
PAP	Project Affected Person
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
SEAH	Sexual Exploitation, Abuse, and Harassment

SEP	Stakeholder Engagement Plan
WB	World Bank
FMS	Federal Member State
WMP	Waste Management Plan

Executive Summary

This Environmental and Social Management Plan (ESMP) has been prepared for the construction of the headquarter building for the Ministry of Livestock, Forestry and Range (MoLFR) of Galmudug State, Somalia. The proposed Subproject involves the construction of a G+1 office facility which consist of Ground plus One (G+1). The Subproject is financed under the World Bank–supported **Somalia Food Systems Resilience Project (S-FSRP)**.

The proposed building will comprise fifteen (15) offices, including dedicated offices for the Minister, Deputy Minister, and Director General, in addition to five (5) departmental offices and associated workspaces. The first floor will accommodate a main conference hall, a reception area, four (4) additional offices, and one laboratory room. Sanitary facilities have been designed as gender-segregated units and include accessible provisions for persons with disabilities, in compliance with universal access principles.

The overall architectural design emphasizes functionality, efficient space utilization, accessibility, and the creation of a conducive and professional working environment. The construction will take place on publicly owned land; therefore, no demolition, land acquisition, physical displacement, or resettlement impacts are anticipated.

The Subproject is expected to generate significant positive impacts by strengthening institutional capacity and improving service delivery in the livestock, forestry, and rangeland sectors. Beneficiaries include Ministry staff, other government agencies, sector stakeholders, and the general public accessing the facility.

The construction works are expected to generate a range of environmental and social risks and impacts that require careful management to ensure the safety and wellbeing of the workers and nearby communities.

Environmentally, the primary concerns include dusts emissions, air pollution, noise and vibrations as wells as occupational health and safety (OHS) risks. Dust generated from the construction activities may deteriorate air quality and affect patients, workers and nearby residents. Similarly, noise and vibration from the machinery and equipment may disturb surrounding communities, particularly, when the activities conducted during the sensitive hours. In addition, construction activities inherently expose workers to occupational hazards such as falling debris, operation and heavy machineries, and potential contacts with hazardous materials.

On the other hand, project specific social risks include; movement restriction due vehicle movement, traffic accidents, community health and safety-related risks. Labor-related risks such as potential occurrence of child labor, exclusion of minority groups, tensions between workers. Gender-based violations (GBV), sexual exploitation and abuses and sexual harassment (SEA/SH) are the potential and site-specific risks during the implementation of the subproject. All these may lead to disruptions and inconveniences to nearby community as well as the workers.

To mitigate these environmental and social risks, a comprehensive set of mitigation measures will be implemented throughout the project phases. Dust and air pollution as well as soil disturbances will be

controlled through regular spraying of the construction areas and debris. A fencing wall will be installed around the site to limit the spread of the dust. Workers will be equipped with personal protective equipment (PPEs) such as masks, helmets, safety boots and gloves to ensure their physical safety. Toolbox talks and trainings will be regularly conducted at the site. Comprehensive mandatory safety training will be provided with all works before any work commences and Code of Conducts (CoC) will be signed. first-aid facilities will be made available on-site to ensure prompt response to any incidents Noise and vibrations impacts will be mitigated/managed by restricting construction activities to daytime hours. Noise reducing equipment will be used where feasible and the nearby residents will be notified in advance about the nature and duration of the works.

In addressing social risks, the project will implement the Stakeholder Engagement Plan to ensure continuous communication and engagement with affected communities. A site-specific grievance mechanism will be established by the contractor to allow workers and community members to raise concerns and receive timely responses. Strict measures will be enforced to prevent child labor and SEA/SH, in line with project policies and standards. Regular communication on project timelines, expected impacts, and benefits will be maintained to manage community expectations, reduce misunderstandings, and foster positive relationships with stakeholders.

Community health and safety will be enhanced through the installation of fencing and clear warning signage around the construction site, along with the implementation of traffic management measures, including designated routes for construction vehicles to minimize risks to the public.

Gender-based Violations, Sexual Exploitation and Abuse and Sexual Harassment sensitization sessions will be provided to all workers to ensure gender equity and empowerment. This also inline with inclusion objective of the project. To mitigate GBV, SEAH and SH risks, site-specific grievance mechanisms will be established to ensure all subproject-related concerns are addressed according and in different levels from constructors up to the bank.

Additionally, regular stakeholder engagements and communication/information sharing with affected community will be conducted daily/weekly bases. Site-specific grievance mechanisms will be established ensuring the rights of the affected populations/persons addressed quickly.

Following the detailed E&S screening of the proposed sub-project, as per the process described in the project's approved ESMF, the sub-project was classified as 'Moderate Risk', as per the levels defined in the ESMF. The project team believes that an Environmental and Social Management Plan (ESMP) would best guide the risk management for the sub-project, during construction and operation phases.

The Subproject is classified as having a Moderate environmental and social risk (site-specific E&S screening checklist duly administered, see Annex 4). This ESMP aims at introducing potential E&S risks and impacts of the subproject during both Construction and Operation phases. However, key risks identified are primarily associated with the Construction phase and are considered site-specific, temporary, reversible and manageable with standard mitigation measures.

This ESMP specifies the means through which the adverse environmental and social risks and impacts of the Project associated with the construction activities are either avoided or mitigated. It identifies, characterizes and manages the potential risks and impacts. The ESMP lists the project-specific risks and impacts, and mitigation measures, lays out institutional arrangements for implementing and monitoring the risk mitigation measures and proposes monitoring indicators for measurement and

monitoring of E&S performance, as well as requirements for capacity building and reporting. It shows what must be done, by whom, when, and to what standard; and shows who will monitor its implementation and when and what the budget implications for mitigation measures and monitoring activities are. It further includes a description of the Project Grievance Mechanism (GM), which needs to be applied during the construction period, and lists stakeholder consultations that have been conducted in the lead up to the project design.

The ESMP has been prepared in compliance with applicable Somali regulations and the World Bank's Environmental and Social Framework (ESF). The Contractor will be contractually obligated to implement this ESMP and prepare site-specific management plans, including a Labor Management Procedure (LMP), GBV/SEA/SH Prevention Plan, Occupational Health and Safety (OHS) Plan, Waste Management Plan (WMP), and Traffic Management Plan. The Contractor will be contractually obligated to adopt and implement this ESMP through the contractor's ESMP (C-ESMP) with oversight provided by the State Project Coordination Unit (SPCU) and supervising engineers to ensure full compliance with ESF requirements.

2. Introduction

The Federal Government of Somalia (FGS) under the Ministry of Livestock, Forestry and Range (MoLFR) has received financial support from the World Bank under the Somali Food Systems Resilience Project (S-FSRP3 P177816).

Interventions expand in all the five federal member states of Puntland, Galmudug, Southwest State, Hirshabelle and Jubaland with an objective to increase preparedness against food insecurity and improve the resilience of food systems in targeted project areas of Somalia. The project intends to benefit an estimated 350,000 small scale farmers, agro-pastoralists, and nomadic pastoralists, of which at least 30 percent will be female.

The project consists of five integrated technical components designed to strengthen Somalia's agricultural and food systems. Component 1 focuses on rebuilding resilient agricultural production capacity through Sub components 1.1, which supports crop and livestock research, extension, and seed systems; 1.2, which enhances community engagement and technology transfer; and 1.3, which promotes digital agriculture solutions and data systems. Component 2 addresses the sustainable development of natural resources for resilient agricultural landscapes, including Sub-component 2.1 on improving water availability for agriculture and livestock, and Sub-component 2.2 on rangeland management. Component 3 aims at improving market access through Sub-component 3.1 on Farmer Producer Organizations and agri-food enterprises, 3.2 on market infrastructure and enterprise development, and 3.3 on expanding access to finance. Component 4 strengthens food systems resilience in policy-making through Sub-component 4.1, which builds ministerial capacity and conducts agri-food policy assessments for the crops sector, and Sub-component 4.2, which does the same for the livestock sector. Component 5 provides project coordination and knowledge management through Sub-component 5.1 on project implementation and coordination and Sub-component 5.2 on monitoring and evaluation.

The Project is financing the construction of building of Ministry of Livestock, Forestry and Range in Dhusamareb city.

2. Purpose of the ESMP

Consistent with the Project's Environmental and Social Management Framework (ESMF), the purpose of this Environmental and Social Management Plan (ESMP) is to establish site-specific mitigation and management measures to address potential adverse environmental and social (E&S) risks and impacts associated with the Subproject. The ESMP is prepared in accordance with applicable national regulatory frameworks and the World Bank Environmental and Social Framework (ESF), including the relevant Environmental and Social Standards (ESSs), as well as the World Bank Group Environmental, Health, and Safety Guidelines (EHSGs) and Good International Industry Practice (GIIP).

The implementation of the Subproject will adhere to the requirements of the World Bank ESF and relevant EHSG provisions, applying the most stringent standards where inconsistencies arise between national and international frameworks.

This ESMP identifies potential environmental and social risks and impacts associated with both the construction and operational phases of the Subproject. It sets out corresponding mitigation, management, monitoring, institutional capacity-building, and reporting measures to ensure compliance with applicable standards. The ESMP serves as an operational tool for the Contractor and the supervising entity, the National Project Coordination Unit (NPCU), to guide effective environmental and social risk management.

The ESMP is a living document and will be periodically reviewed and updated as necessary throughout the Subproject lifecycle, including following the findings and recommendations of annual Environmental and Social audits.

3. Methodology

The ESMP was prepared through a systematic process involving stakeholder consultations, site visits, and a comprehensive review of relevant project documentation, including technical designs and associated studies. Key reference materials included the World Bank ESF and relevant ESS guidance notes and good practice documents; applicable national legislation, policies, and regulatory guidelines; international conventions and treaties; and an assessment of the relevance and applicability of the ESSs to the Subproject.

Stakeholder consultation to inform the preparation and implementation of the ESMP was conducted on 04 September 2025. The consultation aimed to gather input on baseline environmental and social conditions, identify potential risks and impacts, discuss appropriate mitigation measures, and review mechanisms for handling project-related grievances. Participants included representatives from relevant institutions and stakeholder groups. Their feedback and recommendations were incorporated to strengthen the ESMP.

The finalized ESMP will be disclosed in-country in accordance with World Bank disclosure requirements and will guide environmental and social management throughout the construction phase of the Subproject.

3. Sub-project Description

This ESMP is prepared for the construction of a new office building to serve as the main offices for the Ministry of Livestock, Forestry and Range (MOLFR) of the Galmudug State of Somalia, accommodating staff, hosting official meetings, and facilitating the coordination of livestock programs and services across Somalia.

The new building will provide a modern and functional working space for the Ministry's staff, enabling them to effectively carry out their duties, improve coordination, and deliver services that support the livestock sector across the State as well as Somalia. Understanding this operational purpose is essential for analyzing the potential environmental and social impacts during the building's use phase. The construction site is georeferenced as follows, Official Confirmation of Land Ownership and Jurisdiction: MoLFR



Figure 1: Google Earth Map Indicating the Location of the MoLFR in Dhusamareb

See property ownership certificate, D.M. 02 July 2025, No. 31, ministry-owned land for the project purposes, in annex 2.

Project Components/Activities: The project involves the construction of a new two-story (Ground Floor + 1 Upper Floor) reinforced concrete frame building, Cafeteria, Prayer room, storage and external works. Based on the Bill of Quantities (BoQ), key activities include (BoQ, Designs, etc), see Annex 1 for design layout:

- **Substructure:** Site clearance, (Since the project site is already pre-disturbed, only minimal vegetation clearing will be required, and this will not involve the removal of bushes or shrubs), ground leveling on hilly sections, excavation for foundations, hardcore filling, removal of excess soil, and construction of reinforced concrete foundations and a retaining wall.
 - **Superstructure:** Construction of reinforced concrete columns, beams, and slabs for the ground, and first floors.
 - **Walling & Finishes:** Infilling with smooth-dressed hollow blocks, internal and external plastering, painting, floor and wall tiling.
 - **Installations:** Installation of PVC windows, semi-solid core wood doors, and complete sanitary fittings (WCs, washbasins, etc.) for all floors.
 - **Services:** Prime cost sums are allocated for Electrical Installation, Plumbing and Drainage Installation, and Decoration.
- **Location:** The project site is located at coordinates lat. **5.528122**, longit. **46.380888** within new MoLFR compound at Dhusamareb District. A GPS coordinates and architectural drawings of the building will be included in the Contractor's ESMP (C-ESMP). The site is in an urban area and does not contain or border any sensitive ecosystems or water bodies (Ministry Livestock, Forestry and Range of Galmudug Property at Dhusamareb City, Somalia (GPS: **5.528122°N, 46.380888°E**), Restriction of ministry-owned land, see annexes 2.
 - **Timeline & Workforce:** The expected construction duration is 7-9 months. The project will employ both skilled (masons, carpenters, steel benders, plumbers, and electric technicians) and unskilled local labor with an affirmative action for both vulnerable and minority job seekers. Furthermore, qualified engineers and environmental specialists will be engaged to uphold the contractual standards and requirements. The total workforce is estimated at approximately 30–50 workers, comprising both skilled and unskilled labor, with priority given to locally recruited workers. In Somalia, the official working hours are eight per day, typically from 8:00 a.m. to 4:00 p.m., with scheduled breaks included.
 - **Materials & Machinery:** Materials include ready-mix concrete from a local plant, reinforcement steel, cement, aggregates, blocks, tiles, paint, PVC, and wood. Borrow materials (sand, aggregate) will be sourced from designated quarries within the vicinity of Dhusamareb. Machinery will include excavators, trucks, compactors, and concrete vibrators. The MoLFR project site is a new development area with no existing connections to the Dhusamareb water supply or municipal sewage systems. During construction, the contractor will be responsible for arranging a temporary water supply with a dedicated meter gauge and managing sewage through approved disposal methods. The contractor shall also provide clean, safe, and segregated sanitation facilities such as portable toilets for the workforce. Energy requirements for construction activities and machinery will be met through fuel procured from licensed dealers in Galmudug. The contractor will implement a Waste Management Plan (WMP), which includes segregating waste into labeled bins (general and hazardous), storing hazardous

materials such as fuel, oil, and paint in a secure bounded area, and disposing of all waste at government-approved sites.

Access: The site is accessible from the main Dhusamareb road. The contractor will be required to schedule material deliveries during off-peak hours to minimize disruption.

Subproject Alternatives?

Several alternatives were considered during project planning. The **No-Project Alternative** was evaluated but dismissed because it would leave the Ministry operating from inadequate facilities, limiting institutional capacity and undermining the objectives of the S-FSRP. **Alternative sites** within Dhusamareb were conceptually assessed; however, the selected plot is already publicly owned by MoLFR, free from land disputes, centrally located, and presents no resettlement risks, making it the most socially and environmentally appropriate option. Design alternatives included a single-storey layout versus the selected **G+1 configuration**. The latter was chosen as it minimizes land-take, reduces ground disturbance, and provides more functional space. Construction material and technology alternatives were also assessed, with reinforced concrete selected due to its durability, availability of local materials, and suitability for the climatic conditions of Dhusamareb. _Finally, alternative construction schedules were considered to avoid peak rainfall seasons, with the chosen 7–9-month schedule offering the most efficient and least disruptive timeline.

4. Environmental and Social Baseline Description

4.1. Environmental Baseline

The Subproject is situated in a built-up, urban environment within an existing Ministry of Livestock, Forestry and Range compound in Dhusamareb city.

- **Climate and Natural Hazard Context:** Dhusamareb lies within a semi-arid climatic zone characterized by chronic drought, high evapotranspiration rates, and increasing temperature variability linked to climate change. Although the project site itself is not flood-prone, the city frequently experiences intense, short-duration rainfall events during the *Gu* and *Deyr* seasons, which can overwhelm drainage systems and cause temporary surface runoff. These climatic conditions require construction planning that considers heat stress for workers, dust generation during dry months, and stormwater control during peak rainfall periods’.
- To address the recurring challenge of temporary waterlogging during the rainy seasons, the Municipality of Dhusamareb is currently undertaking a comprehensive road rehabilitation initiative across the city. This intervention incorporates the installation of advanced subsurface drainage systems designed to effectively manage stormwater and enhance urban resilience. The project is being implemented with financial support from the World Bank under the “NAGAAD Project,” which aims to improve urban infrastructure and reduce flood-related risks.

- **Living Environment (Flora & Fauna):** The site is pre-disturbed with minimal vegetation, described as "no bushes and shrub." There are no protected areas, critical habitats, or known endangered species on or near the site. Only minor occurrences of common urban fauna, such as birds, and insects, may be observed, but these are minimal ecological concern. The contractor will be required to conduct a pre-construction walkover to confirm the absence of any sensitive ecological features. However, if any fauna of ecological importance or protected species is unexpectedly observed during construction, work in the immediate area will be halted, the relevant environmental authority will be informed, and appropriate mitigation measures will be implemented to ensure their protection.
- **Non-Living Environment:** Firstly, the project site is located in an urban area that is not naturally prone to significant soil erosion. Nonetheless, construction activities, particularly excavation for foundations, may temporarily disturb the soil and create localized erosion risks. To mitigate this, the contractor will apply standard control measures, including soil compaction, temporary cover, and proper site drainage management. Dhusamareb's climate is hot and semi-arid, with year-round high temperatures averaging between 25°C and 35°C. Rainfall is seasonal, occurring mainly during the "Gu" rains (April–June) and the shorter "Deyr" rains (October–December), while the remaining months are largely dry.
- Secondly, the primary environmental concerns related to the project are air quality (dust from construction) and noise. The Subproject is located in a densely populated urban district where baseline air quality and noise levels are already influenced by traffic and other city activities. During the 7–9-month construction phase, temporary impacts are expected, including dust from site clearance, excavation, vehicle movement, and material stockpiling, as well as gaseous emissions (SO_x, NO_x) from machinery and generators. Noise and vibration will also increase due to heavy equipment operations such as excavators and trucks, which will be required primarily during the initial stages of construction. These impacts are short-term and will be managed through C-ESMP measures, including regular water spraying for dust suppression, covering stockpiles, maintaining equipment to minimize emissions, and restricting noisy activities to standard daytime working hours. Finally, the Subproject is not located in a flood-prone area, and there are no surface water bodies that could be impacted.

4.2. Social Baseline

- **Community Health Profile:** Dhusamareb faces a high burden of respiratory illnesses linked to dust, open burning, and widespread reliance on diesel generators. Water-borne diseases can increase during rainy seasons due to poor drainage and the absence of sewage systems. These existing vulnerabilities mean that construction-phase dust, noise, traffic, and wastewater require careful management to avoid aggravating community health risks.
- **Socio-economic Context:** Dhusamareb's socio-economic landscape features significant income disparities, with remittances from the diaspora and a growing service sector playing crucial roles in the economy, while recurrent droughts and poverty, especially among Internally Displaced Persons (IDPs) and host communities, present ongoing challenges. Despite increasing real estate development and a formalizing planning process, there's a critical need

for policies that foster economic empowerment, skills development, and integrate IDPs and vulnerable groups to promote self-sufficiency and social cohesion.

- Demographically, the population is composed of host communities and a significant proportion of Internally Displaced Persons (IDPs), many of whom have relocated due to recurrent droughts and insecurity in rural areas. Demographically, youth constitute the majority of the population, reflecting Somalia's broader age structure, with high levels of unemployment and underemployment among young people. Women, particularly in IDP settings, often engage in informal economic activities such as petty trade, small-scale food vending, and casual labor, yet face structural barriers including limited access to finance, land ownership, and formal employment opportunities. Elderly persons and people with disabilities remain among the most vulnerable groups, often relying on family support, remittances, or humanitarian assistance for survival. Economically, the city is characterized by notable income disparities. Households with access to diaspora remittances tend to have relatively stable incomes and are able to invest in housing, small businesses, and education,

In terms of education, access remains limited but gradually improving. The city hosts a number of primary and secondary schools, as well as emerging higher education institutions such as Galmudug State University and several private institutes offering diploma and vocational training programs. However, school enrollment and retention rates, particularly among girls and children from IDP households, are constrained by financial barriers, displacement, and competing livelihood needs. Informal education and skills training opportunities are also limited, contributing to a mismatch between labor market demands and available workforce skills, especially among youth.

- **Livelihood:** Livelihoods in Dhusamareb rely on a mix of livestock farming, which forms the economic backbone, and commerce and trade centered around the city's role as a business and transit hub for both local and imported goods. Women are particularly active in small-scale trading and household income generation, while men focus on higher-value trades and services. The economy also includes small-scale enterprises like vehicle repair, blacksmithing, and construction, and is supported by the constant flow of remittances from abroad.
- **Administration and Governance:** Dhusamareb, the capital of Galmudug State, is administered by its municipal government and the Galmudug State government, which is responsible for the regional parliament, presidential palace, and government ministries. Local administration focuses on service delivery in health, education, and water, with efforts to modernize property tax systems. However, challenges like corruption, lack of transparency, and limited public awareness hinder effective tax collection and overall governance.
- **Gender-based Violence (GBV):** Somalia is a patriarchal society with firmly entrenched gender roles that often subjugate women and girls. GBV is pervasive, particularly female genital mutilation/cutting (FGM/C), early marriage and psychological abuse. GBV is not rampant in Dhusamareb as the administration had tried to establish mechanism to deal with such though still some cases exist within the local setting and the IDPs and resettlement settings. As the proposed project site is within the city, sexual exploitation and abuses and sexual harassment training and sensitization sessions will be given to the workers at site and regular monitoring was such cases will be monitored. Reporting mechanisms including grievance redress mechanisms will be established. Received cases will be handled in accordance with project approved ESMF.

- **Local community composition:** the primary composition of Dhusamareb's community consists of Somalis from various clans, with significant populations of the Hawiye, Darod (Mareehan) clans, along with a Madhibaan and Tumul population. A significant and growing portion of the population is also composed of internally displaced persons (IDPs) from other parts of Somalia. This displaced population, along with other residents, faces challenges such as limited social and economic interaction, poverty, food insecurity, and lack of opportunities.
- **Minority/vulnerable groups:** In Dhusamareb, vulnerable groups include Internally Displaced Persons (IDPs) fleeing conflict and drought, low-status occupational minorities like the Madhiban, Tumul, and Rahanweyn, and other vulnerable populations such as street children, women, and people with disabilities. These groups experience challenges in accessing basic services like housing, water, and healthcare, are often excluded from political and economic life, and face heightened risks of physical and sexual violence, mental health issues, and social isolation.
- **Access to Water and Electricity:** Access to water and electricity in Dhusamareb is characterized by significant challenges, including limited and costly water supplies, and high electricity prices due to reliance on diesel-powered grids. However, efforts are underway to improve these services, with projects like a wind and solar power station operated by private companies serving some of the population and initiatives focused on rainwater harvesting and sustainable water management to address scarcity in the wider Galmudug region.
- **Waste Management:** Solid waste management in Dhusamareb is a challenge. Dhusamareb produces a considerable amount of waste every day, and in many areas, waste is dumped in open spaces, leading to contamination of soil, water, and air, which can cause infections, skin diseases, and respiratory illnesses.

In Dhusamareb, although the Municipality regulates waste collection, there are no well-developed municipal dumpsites for construction waste within the city limits. The contractor will therefore be required to use the designated dumpsite specified by the Dhusamareb Municipality for all construction waste disposal. Some privately owned companies that are licensed waste management service providers headquartered in Dhusamareb, offer solid waste collection, transportation, and disposal services in coordination with the Municipality. The contractor is encouraged to collaborate with local authority to ensure proper handling and environmentally sound disposal of all construction waste generated during the project.

- **Cultural Heritage:** There are no known sites of cultural or archaeological significance within the Subproject area. A "chance finds" procedure will be included in the contractor's ESMP.
- **Security:** Security in Dhusamareb is managed by Galmudug security forces who conduct operations to combat threats and ensure public safety, while international and private security companies offer a range of services from crisis management to aviation and maritime security.
- The overall security situation in Dhusamareb demands careful management. While the subproject's location within a secured government compound reduces some risks, the

contractor will remain fully responsible for securing the immediate construction site, workers, and materials, and for coordinating closely with local security forces.

5. Legal and Regulatory Framework

This chapter focuses on the relevant provisions of key Somali policy, legal, regulatory and institutional framework, which are related to the activities to be carried out under this project. This chapter also includes other ESF provisions as required by the World Bank and associated Environmental Health and Safety Guidelines (EHSs) and Good International Industrial Practice (GIIP) to which the borrower is obliged to. It also presents an analysis of gaps between both national and WB's provisions. Additionally, this chapter presents relevant international conventions and treaties, which the FGS has signed or ratified. The Subproject will be implemented in accordance with the national laws of Somalia and the environmental and social Framework and applicable standards of the World Bank.

5.1. The National Framework

All activities will comply with the relevant laws and regulations of the Federal Government of Somalia, & Galmudug State of Somalia including the constitution and all relevant legislations.

The provisional Constitution of Somalia:

Article 10 – Human Dignity: Human dignity is the basis for all human rights. It is inviolable and must be protected by all. The State power must not be exercised in a manner that violates human dignity.

Article 11 – Equality: All citizens, regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect shall have equal rights and duties before the law. The State must not discriminate against any person on the basis of age, race, color, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth. Thus, all laws, or political and administrative actions that are designed to achieve full equality for individuals or groups who are disadvantaged, or have suffered from discrimination in the past, shall be deemed to be not discriminatory.

Article 24 – Labor Relations: Every person has the right to fair labor relations. All workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the workplace. And, every labor law and practice shall comply with gender equality in the workplace.

Article 31 – Language and Culture: The state shall promote the positive traditions and cultural practices, whilst striving to eliminate customs and emerging practices, which negatively impact the unity, civilization and wellbeing of the Somali society. And the state shall promote the cultural practices and local dialects of minorities.

Article 32 – Right of Access to Information: Every person has the right of access to information held by the state, and the right of access to any information that is held by another person which is required for the exercise or protection of any other just right.

Article 27 (1 & 5) Economic and social rights- right to clean portable water. Women, aged and disabled and minorities who have suffered discrimination to be supported to realize their full potential.

Article 43 Land: land is recognized as primary resource and the basis of the people's livelihood; b) land shall be held, used and managed in an equitable, efficient, productive and sustainable manner; c) the FGS shall develop a national land policy, which shall be subject to constant review, d) no permit may be granted regarding the permanent use of any portion of the land, sea or air of the territory of the Federal Republic of Somalia, e) the FGS, in consultation with the FMS and other stakeholders, shall regulate land policy, and land control and use measures.

Article 111J – The Office of the Ombudsman: The office is protected against interference from any other person or entity. As such, independence, integrity and effective service delivery are also maintained. The Ombudsman shall: (i) Investigate complaints against government workers regarding: allegations/ outright violations concerning basic rights and freedom, abuse of power, unfair behavior, mercilessness, lack of clemency, indiscipline or disrespect, corruptive act, illegal behavior, or those that could lead to mischief or injustice; (ii) Investigate complaints in relation to the activities of the Public Service Commission and other administrative institutions of the government, including defense and police forces that could lead to unequal services, unfair recruitment, or administration; (iii) Take appropriate steps to rectify or change items mentioned in earlier clauses through a fair, and appropriate process of consultations and sacrifices among the people concerned; (iv) Report on the complaints and issues raised and submit to the head of the offender; (v) Forward cases to the Attorney General and bring them before a court, as appropriate.

Article 111H – National Security Commission: A National Security Commission shall be established to study and develop an integrated security framework to address present and future needs of Somalia. It shall present proposals to ensure that human security is prioritized and incorporated into such a framework, through which the public may provide oversight and monitor security related expenditure and seek redress from abuses by security personnel.

Article 45 (—Environment) states that the 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. Furthermore, all people have a duty to safeguard and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment. The FGS and the governments of the FMS affected by environmental damage shall take urgent measures to clean up hazardous waste dumped on the land or in the waters of the FGS; take necessary measures to reverse desertification, deforestation and environmental degradation, and to conserve the environment and prevent activities that damage the natural resources and the environment of the nation, among other measures.

Relevant National legislation:

Environmental Protection and Management Act, 2024: The act guarantees the right to a clean, safe and healthy environment, provides requirements for waste management including hazardous wastes. The act requires the application of the polluter pay and precautionary principle in environment management. The construction project is required to adhere to all the relevant requirements prescribed by the act.

Environmental and Social Impact Assessment and Audit Regulations (ESIA) 2024: Part III, regulations 13, 16 and 17, guides public participation, collection and incorporation of views from the general public.

the Somali Labour Code (Law No. 36 of 2024), the Public Health legislation, 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.

5.2. The World Bank Framework

As the Subproject is classified as having a "Moderate" environmental and social risk, a full Environmental Impact Assessment (EIA) is not required. This site-specific **Environmental and Social Management Plan (ESMP)** will serve as the primary instrument for identifying, assessing, and managing all potential risks and impacts.

In the absence of specific Somali national standards for air quality, water quality, or noise, or where such standards are less stringent, the project will adhere to internationally recognized benchmarks, including the WB ESF, **World Bank Group's General EHS Guidelines** and, where applicable, **World Health Organization (WHO)** standards. These standards will guide all management and monitoring activities throughout the project lifecycle.

Table: Relevance of ESF Environmental and Social Standards (ESSs) to the MoLFR HQ Construction Sub-project, – Dhusamareb, Galmudug State

ESS	Relevance Level	Why Relevant to the Sub-project	Key Issues Triggered	Mitigation Measures (as per ESMP & C-ESMP requirements)
ESS1 – Assessment & Management of Environmental & Social Risks and Impacts	Highly Relevant	Construction activities require structured E&S risk assessment, monitoring, reporting, and mitigation.	Need for ESMP, screening, monitoring, C-ESMP implementation, compliance oversight.	• Prepare and implement project-specific ESMP and C-ESMP. • Integrate all E&S instruments (LMP, OHS Plan, SEP, GM, WMP, GBV/SEA-SH Action Plan). • Continuous E&S supervision, monitoring, incident reporting, and corrective action.
ESS2 – Labor & Working Conditions	Highly Relevant	Project uses skilled and unskilled workers; OHS and labor protections are mandatory.	OHS hazards, child labor prohibition, CoC, worker GM, GBV/SEA/SH, fair conditions.	• Enforce LMP and prohibit child/forced labor; verify age and contracts. • Provide PPE, OHS training, toolbox talks. • Gender-responsive facilities (segregated toilets, rest areas).

ESS	Relevance Level	Why Relevant to the Sub-project	Key Issues Triggered	Mitigation Measures (as per ESMP & C-ESMP requirements)
				• Workers' GM and signed Codes of Conduct (with GBV clauses). • Regular monitoring of OHS compliance.
ESS3 – Resource Efficiency & Pollution Prevention and Management	Highly Relevant	Construction generates dust, noise, waste, emissions, and uses materials, fuel, and water.	Dust, noise, hazardous waste, waste disposal, emissions, resource use.	• Waste Management Plan (segregation, licensed disposal). • Dust suppression (water spraying, covering stockpiles). • Maintain machinery to reduce emissions. • Noise control and daytime working hours. • Efficient water/energy use; monitor consumption.
ESS4 – Community Health & Safety	Highly Relevant	Nearby ministry staff, visitors, and public are exposed to construction hazards.	Traffic risks, debris hazards, labor influx, communicable diseases, security issues.	• Site fencing, warning signs, restricted access. • Traffic Management Plan (speed limits, routing, awareness). • Community GM, engagement, GBV-sensitive communication. • Worker Code of Conduct (no harassment). • Emergency Preparedness & Response Plan (fire, accidents).
ESS5 – Land Acquisition, Restrictions on Land Use & Involuntary Resettlement	Relevant (Low)	Construction is on public land owned by MoLFR; no displacement expected but documentation required.	Land ownership verification, preventing disputes.	• Maintain and attach official land ownership documentation. • Confirm no physical or economic displacement. • Consult community and municipality to avoid future disputes.
ESS6 – Biodiversity Conservation & Sustainable Management of Living Natural Resources	Minimal Relevancy	Site is fully urbanized and pre-disturbed; no natural habitats present.	Biodiversity screening only.	• Pre-construction walkover to confirm no sensitive fauna/flora. • Halt work and notify authorities if unexpected fauna or sensitive species appear.

ESS	Relevance Level	Why Relevant to the Sub-project	Key Issues Triggered	Mitigation Measures (as per ESMP & C-ESMP requirements)
ESS8 – Cultural Heritage	Relevant	Excavation could uncover archaeological or cultural artifacts.	Chance-finds risk during excavation.	• Include Chance-Finds Procedure in bidding documents and C-ESMP. • Stop work immediately if artifacts are found. • Report to authorities and follow national protocols.
ESS10 – Stakeholder Engagement & Information Disclosure	Highly Relevant	Community, MoLFR staff, and nearby institutions must be consulted and informed.	Inclusive engagement, GM access, women's participation, transparency.	• Implement SEP and hold inclusive consultations (women/PWD/minorities). • Maintain accessible GM (hotline 3060, complaint boxes). • Public disclosure of project info in Somali/local languages. • Record consultations and feedback.

World Bank Group EHS Guidelines: The project will adhere to the WBG's General Environmental, Health, and Safety (EHS) Guidelines (EHSGs). The Subproject's commitment to adhering to the World Bank Group's General Environmental, Health, and Safety (EHS) Guidelines is a cornerstone of its risk management strategy. These guidelines are technical reference documents that define **Good International Industry Practice (GIIP)** for managing EHS issues in a sustainable manner. For this civil works project, they are critically important as they provide a practical and authoritative framework for implementing effective mitigation measures related to **Occupational Health and Safety** (e.g., use of PPE, site safety protocols), **Community Health and Safety** (e.g., site security, traffic management), and **Environmental Pollution Control** (e.g., managing dust, noise, and waste) during construction and operation. Their application ensures the Subproject is implemented to a high standard of safety and environmental stewardship. In cases where Somali regulations and World Bank policies differ, the World Bank Standards will prevail and will be applied. This ESMP, along with the associated plans, S-FSRP Frameworks, and Manuals (ESMF, RPF, IPMP, LMP, WMP, GM, SEP, etc.), is legally binding on the contractor. The Contractor is required to prepare their C-ESMP upon signing the work contract and before commencing work. This preparation is based on the proposed management framework of this document (ESMP), the World Bank Environmental and Social Framework (ESF), and the Good International Industry Practice (GIIP) included in the EHSGs.

Detailed gap analysis has been developed with the project approved ESMF, refer to the following link: https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099101123104521377/p1778160d5cf1003093810fb7fa9629a42?utm_source=chatgpt.com

6. Environmental and Social Risks and Impacts – Overview

6.1. The Subproject's Positive Impacts

The Agricultural sector has seen recent vulnerability due to recurrent natural and man-made disasters, including fluctuating levels of conflict, poverty, economic crunch, political uncertainties, drought, floods and epidemics. The construction of ministry of Livestock building shall provide conducive environment and space to plan, organize and develop policies to help address the challenges facing the Agricultural and Livestock sectors in Somalia.

6.2. The Expected Negative E&S Risks and Impacts

Based on the site visits conducted by E&S specialists, the stakeholder consultation meetings (01.09 – 04.09.2025), as well as referring to the applicable ESSs of the World Bank's ESF and parent ESMF of the S-FSRP, the following site-specific E&S risks and impacts have been identified for the new construction subproject of MoLFR offices.

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

The subproject site is located within a fully urbanized and pre-disturbed compound belonging to MoLFR, with no known natural habitats, critical ecosystems, or wildlife migration routes.

Biodiversity risks are therefore minimal. However, minor disturbances may occur to common urban fauna such as birds and insects during excavation and site clearance.

Mitigation measures will include: (i) a pre-construction ecological walkover to confirm absence of nesting birds or sensitive fauna; (ii) restricting vegetation removal to the designated footprint; (iii) preventing workers from hunting, trapping, or disturbing wildlife; (iv) managing dust emissions and waste to avoid indirect habitat impact; and (v) restoring any temporarily disturbed areas with native ground cover.

If any unexpected fauna or ecologically sensitive species are encountered during construction, work in the immediate area will stop and the SPCU environmental team will guide necessary protective measures.

Table 1: Environmental and Social Risks and Impacts during construction and operation phases – overview

Risk Category	Key Risks and Impacts	Risk Rating
ESS 1: E&S Assessment and Management	- Inadequate implementation or monitoring of the ESMP, leading to unmitigated impacts. Inclusion of vulnerable and minority groups	- Moderate during construction - Minor during operation

Risk Category	Key Risks and Impacts	Risk Rating
ESS 2: Labor and Working Conditions	- A wide variety of OHS hazards for workers (Over-exertion, Work in heights, struck by objects, exposure to dust, chemicals, hazardous or flammable materials, falling objects, different injuries, electrocution, slips and falls, confined spaces and excavations) during demolition and construction activities; - Potential non-compliance with labor laws (child/forced labor); - Labour disputes over terms and conditions, including wages, working hours, payment delays, health and safety concerns in the work environment and working conditions; - Violation of the signed code of conduct for workers, including Gender-based Violence (GBV)/Sexual Exploitation Abuse and/or Sexual Harassment (SEA/SH); - Discrimination in workplace, including unequal inclusion opportunities for women, and minority groups in the intended activities, which could extend to the operation phase; - Lack of a functional worker' grievance mechanism.	- Moderate during construction - Minor during operation
ESS 3: Resource Efficiency & Pollution Prevention	- Intensive use of water and energy resources; - Air pollution (dust, vehicle emissions); noise and vibration from machinery; - soil/water contamination from improper management of waste/hazardous material storage and disposal, including construction waste. - Lack of a functional GM	- Moderate during construction - Moderate during operation
ESS 4: Community Health and Safety	- Safety hazards for MoLFR staff/visitors from construction activities and debris; risk of spread of communicable diseases from the workforce. - Potential risks of intimidation, abuse, or conflict between security personnel and community members, especially at project sites. - Traffic and road safety hazards due to transporting staff, material, equipment, and waste from/to the worksite. - Lack of preparedness for emergencies (e.g., fire, accidents) could lead to harm to local communities - Gender based violence within the community brought by workers.	- Moderate during construction - Moderate during operation

Risk Category	Key Risks and Impacts	Risk Rating
	- Security risks on the assets, people and against the community around the construction site.	
ESS5: Land Acquisition, Restrictions on land use and Involuntary Resettlement	Risk of construction being on land not exclusively owned by the ministry, inadequate land ownership documentation, etc	Minor during construction
ESS6 : Biodiversity Conservation and Sustainable Management of Living Natural Resources	• a pre-construction ecological walkover to confirm absence of nesting birds or sensitive fauna; • restricting vegetation removal to the designated footprint; • preventing workers from hunting, trapping, or disturbing wildlife; • managing dust emissions and waste to avoid indirect habitat impact; and • restoring any temporarily disturbed areas with native ground cover. •	
ESS8: Cultural Heritage	Risk of the contractor as they excavate exhuming artifacts or otherwise items of special interest culturally and traditionally	Moderate during construction
ESS 10: Stakeholder Engagement	Exclusion of certain groups (e.g., women, minority groups, persons with disability) from consultation; lack of access to information or a functional grievance mechanism, leading to unresolved complaints.	- moderate during construction - substantial during operation

7. Environmental and Social Management Plan

Table 2 below proposes E&S mitigation measures, including methods, responsibilities, frequency, and cost planning for alleviating the adverse risks and impacts, during construction and operation phases of the subproject.

Table 2: Environmental and Social Management Plan

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

The subproject site is located within a fully urbanized and pre-disturbed compound belonging to MoLFR, with no known natural habitats, critical ecosystems, or wildlife migration routes. Biodiversity risks are therefore minimal. However, minor disturbances may occur to common urban fauna such as birds and insects during excavation and site clearance.

Mitigation measures will include: (i) a pre-construction ecological walkover to confirm absence of nesting birds or sensitive fauna; (ii) restricting vegetation removal to the designated footprint; (iii) preventing workers from hunting, trapping, or disturbing wildlife; (iv) managing dust emissions and waste to avoid indirect habitat impact; and (v) restoring any temporarily disturbed areas with native ground cover.

If any unexpected fauna or ecologically sensitive species are encountered during construction, work in the immediate area will stop and the SPCU environmental team will guide necessary protective measures.

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
EES1	- Inadequate E&S Management - Failure to manage risks as planned. - Inadequate assessment and management of E&S and GBV risks -	- Develop this detailed ESMP based on the ESMF. Integrate all E&S plans (LMP, OHS, SEP, GM, WMP, GBV/SEA-SH Action Plan) into project design and contracts. - Assign dedicated Social and GBV focal points within SPCU. - Conduct mandatory E&S and GBV induction training for contractors prior to mobilization. Carry out regular E&S supervision, monitoring, and reporting.	- Contractual clauses - C-ESMP approval process - Qualified personnel. - E&S supervision checklists - Training materials & attendance sheets - Monitoring & quarterly reports (the E&S team together with M&E specialist will regularly visit	- Approved ESMP and C-ESMP in place prior to commencement of works (Yes/No) - % of subprojects with all required E&S instruments integrated into contracts - Number of qualified E&S and GBV personnel assigned and operational - Number and % of contractors receiving E&S and GBV induction training prior to mobilization - Frequency of E&S supervision visits conducted (e.g., monthly/quarterly) - % of identified E&S non-compliances corrected within agreed timeframe	- Contractor, - SPCU	- Construction - Pre-construction	- Pre-construction and throughout construction - Pre-construction and throughout construction	- Included in project management budget

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		Integrate E&S and GBV compliance into contractor performance management. - Increase knowledge on World Bank's ESF and World Bank Group's EHSGs	the site and monitor to ensure the implementation aligns with approved ESF, ESS, ESMP and C-ESM)	- Number of E&S and GBV monitoring reports submitted on time - Inclusion of E&S performance in contractor evaluation reports (Yes/No) - Number of capacity-building sessions conducted on ESF/EHSGs - Level of compliance with ESMP requirements based on supervision checklists (%)				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
(ESS2):	- lack of proper contract, - Child/forced labor, - gender discrimination and vulnerable group exclusion, - lack of worker's GM. - Exposing workers to accidents, health risks, and GBV vulnerabilities	- Implement Labor Management Procedures (LMP). - Verify worker ages (no one under 18); prohibit forced labor. - Actively recruit women for suitable roles. - Awareness raising of all project implementers, contractors and primary suppliers on the requirements and implementation of the inclusion plan. - Promote inclusion of disadvantaged and vulnerable groups in consultations and access to project benefits. - Promote diversity in recruitment including	- LMP document - Worker contracts, ID checks - Code of Conduct - Worker GM procedure. - GBV/SEA-SH training materials and attendance records - Worker's GM procedures with SEA/SO protocols.	• % of workers with signed contracts, verified age (18+), and signed Code of Conduct • Number of child labor and forced labor cases identified (target: zero) • % of female workers and representation of vulnerable groups (including PWDs) • Number of workers trained on labor rights, OHS, and GBV/SEA-SH and % attendance rate • Number of GBV/SEA-SH awareness sessions conducted and % of workforce covered • Availability and accessibility of functional worker grievance mechanism	- Contractor and SPCU - GBV/Social Safeguards Focal Point - MOLFR (during operation)	- Construction - Operation (except for child/forced work)	- Throughout construction - Throughout operation, where applicable. - Regular refresher trainings during construction	- Included in Contract price for implementation - Included in project management budget for support - Included in operational cost of the MOLFR

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		all disadvantaged and vulnerable groups, PWDs and women. There may be a need to put b quotas for gender and PWDs. - Establish and publicize a confidential worker GM. - All workers (including subcontractors) to sign a Code of Conduct with GBV/SEA-SH prohibitions and sanctions. Provide mandatory induction and refresher training on labor rights, CoC, and GBV/SEA-SH. Ensure safe, gender-segregated sanitation		(including GBV-sensitive channels) • Number of grievances received, resolved, and pending (including GBV cases handled confidentially) • % of workers provided with appropriate PPE and observed compliance rate • Frequency of OHS toolbox talks conducted and % of worker participation • Number of OHS inspections conducted and % of corrective actions implemented • % of worksites with adequate welfare facilities (water, sanitation, shelters,				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		and basic welfare facilities at worksites. Integrate confidential and survivor-centered SEA/SH reporting channels within the worker's GM.		gender-segregated facilities) Number of occupational incidents reported (injuries, noise exposure, vibration, heat stress, traffic, fatigue-related cases) and response actions taken -				

		- Provide workers with clean water and segregated, clean sanitation facilities. - Provide all workers with appropriate PPE and conduct mandatory daily/weekly OHS toolbox talks. - Provide hearing protection where necessary (when sound level over 8 hours reaches 85 dB(A)) in compliance with EHSGs. - Use of acoustic insulation materials, isolation of noise source, and other engineering controls. - Address vibration hazards by selecting low-vibration equipment, installing vibration dampening systems, and limiting	- LMP document - PPE, OHS training records - Written employment terms and conditions. - Gender-responsive OHS checklists - Worker's GM procedures with GBV-sensitive reporting.	-	- Contractor and SPCU - MOLFR (during operation). - Social / GBV Safeguards Focal Point	- Construction - Operation (relevant only to employment terms and conditions)	- Throughout construction - Throughout operation, where applicable	- Included in Contract price for implementation - Included in project management budget for support - Included in operational cost of the MOLFR
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		exposure time to prevent health impacts, as advised by the EHSs for physical hazards. - Provide temporary shelters for workers to protect against adverse weather conditions and for use as rest areas, ensuring that the work environment accommodates natural elements and supports worker health, as per EHS recommendations. - Regularly monitor weather conditions for outdoor operations to implement adaptive work schedules, safeguarding workers against environmental risks and aligning with EHS guidance						
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		on occupational health management. - Modify work-rest cycles based on temperature and environmental conditions to prevent heat stress or cold stress, following the EHS's recommendations for managing thermal stress. - Ensure the proper training and licensing of operators of industrial vehicles, emphasizing the safe operation of such equipment, in line with EHS's requirements for worker safety and training. - Develop and enforce operational protocols, including establishing rights of way, setting						
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		site speed limits, mandating vehicle inspections, and outlining specific operating rules and procedures, to enhance site safety consistent with EHS standards. - Utilize mechanical aids to reduce physical exertions associated with manual handling tasks, such as lifting materials and operating tools, to minimize the risk of musculoskeletal disorders, in accordance with EHS ergonomic principles. - Integrate regular rest breaks, stretching exercises, and job rotation into work schedules to reduce						
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		repetitive strain and fatigue, promoting a holistic approach to worker health and ergonomics as advised by the EHSs. - Ensure OHS measures are gender-responsive, including separate sanitation and changing facilities for women. - Ensure adequate lighting, safe access routes, and secure work areas to reduce risks of harassment or abuse at the workplace. - Include GBV/SEA-SH risk awareness within OHS toolbox talks and worker's inductions. - Ensure availability of confidential workers						
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		grievance mechanisms to report OHS and GBV-related concerns without retaliation.						
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ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
Community health and Safety ESS4	- CoC breach - GBV/SEAH cases/risks - lack of Site-specific GM.	- Implementation and monitoring of GBV / SEAH Response and Action Plan - GBV sensitization sessions for community members - GBV awareness sessions for site workers - Engage a dedicated specialist to support oversight and management of these risks - Workers to sign a strict CoC and include clear penalties in case of violation. - Include a dedicated GBV/SEAH mechanism within the workers' GM.	- GBV/SEA/SH Response and Action Plan - Code of Conduct within the, written work agreement - Sensitization sessions - GBV/SEAH dedicated GM. - GBV referral pathway mapping - Confidential case management protocols.	• % of project workers who have signed the Code of Conduct (CoC) prior to deployment • # and % of CoC breach cases reported, investigated, and resolved in accordance with established procedures • Number of GBV/SEAH incidents reported through the project Grievance Mechanism (GM), disaggregated by type, gender, and age (with strict confidentiality maintained) • Percentage of reported GBV/SEAH cases referred to appropriate service providers within 48 hours	- Contractor and SPCU - MOLFR (during operation) - GBV Specialist / Social Safeguards Focal Point	- Construction - Operation, where applicable	- Throughout construction - Throughout operation, where applicable	- Included in Contract price for implementation - Included in project management budget for support - Included in operational cost of the MOLFR

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		- Adopt a survivor-centered approach (confidentiality, consent, safety, non-discrimination) in handling all SEA-SH cases. - Establish and publicize confidential referral pathways to qualified GBV service providers (health, psychosocial, legal). - Prohibit contractor-led investigations of SEA-SH cases; ensure cases are referred through appropriate channels. - Conduct separate, female-only community		• Availability and functionality of a dedicated GBV/SEAH-sensitive Grievance Mechanism (GM) at site level (Yes/No, with periodic verification) • Number of grievances related to GBV/SEAH received through the GM and resolved within the stipulated timeframe • Existence and operationalization of a GBV/SEAH Response and Action Plan (approved, disclosed, and under implementation) • Number of community sensitization sessions conducted on GBV/SEAH risks and prevention,				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		awareness sessions facilitated by trained female staff. - Ensure protection against retaliation for survivors and complainants. - Include GBV/SEA-SH compliance as part of contractor performance monitoring and supervision.		disaggregated by gender and target group • Number of female-only awareness sessions conducted and level of participation of women and girls • Number of site workers trained on GBV/SEAH prevention, Code of Conduct, and acceptable behavior • Percentage of workers demonstrating understanding of GBV/SEAH protocols and CoC obligations (based on post-training assessments or spot checks) • Presence of a qualified GBV/SEAH specialist engaged and actively supporting				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
				implementation and monitoring (Yes/No, with activity reports) • Availability and dissemination of mapped GBV referral pathways (health, psychosocial, legal) within the community and worksites • Number of survivors accessing GBV services through referral pathways (reported in anonymized and aggregated form) • Evidence of survivor-centered approach applied in all reported cases (confidentiality, consent, safety, and non-discrimination) • Number of reported retaliation or intimidation				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
				cases against complainants/survivors and actions taken • Inclusion of GBV/SEAH compliance criteria in contractor performance evaluations (Yes/No and frequency of assessment) • Number of contractor supervision reports that include GBV/SEAH compliance and risk monitoring • Percentage of SEA/SH cases handled outside contractor structures and referred through appropriate independent channels • Frequency of monitoring and audit of GBV/SEAH risk				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
				mitigation measures (monthly/quarterly) -				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
(ESS3):	- Dust, noise, vibration, vehicle emissions. - soil disturbances	- Implement dust suppression measures (e.g., regular water spraying on roads/stockpiles). - Schedule high-noise/vibration activities during standard daytime hours. - Ensure all vehicles and machinery are well-maintained and have emission certificates.	- Water truck/sprinklers - Work scheduling - Vehicle maintenance logs	- Number of dust suppression activities conducted per day/week - Presence/absence of visible dust emissions at work sites (based on site inspection reports) - Number of complaints received from nearby communities regarding dust - Frequency of site inspections confirming compliance with dust control measures - Noise levels (dB) recorded at site boundaries compared to permissible standards - Percentage of high-noise activities conducted within approved daytime hours	Contractor with the monitoring of the SPCU dedicated team MOLFR (during operation)	- Construction - Operation, where applicable	- Daily during construction - Throughout operation, where applicable	- Part of the contractor's rate (contract) - Included in operational cost of the MOLFR

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
				Number of community complaints related to noise and vibration Availability and use of noise control measures (e.g., silencers, barriers) % of vehicles and machinery with valid maintenance records and emission certificates Frequency of equipment maintenance checks conducted (weekly/monthly logs) Visible smoke emissions from machinery (inspection-based indicator) Evidence of soil erosion or degradation observed during inspections				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
				Implementation of soil stabilization/restoration measures Number of non-compliance incidents related to improper excavation or land clearing Volume of water consumed per day/week compared to planned usage Number of water-saving measures implemented (e.g., recycling systems, low-flow fixtures) Fuel and electricity consumption rates for generators and machinery Frequency of inspections identifying abnormal resource consumption				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
				Number and % of workers trained on resource efficiency and pollution prevention Availability of training records and attendance sheets Observed compliance of workers with resource-saving practices during site inspections Availability and condition of protective covers for water storage facilities Incidents of heat-related stress reported among workers Availability and completeness of resource consumption records (water, fuel, electricity)				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
				Frequency of monitoring reports prepared and submitted (weekly/monthly) Corrective actions taken based on monitoring findings				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		Train workers on the importance of resource conservation. Promote the use of water-saving techniques, such as low-fixtures or water recycling systems. - Regularly check generators, machinery, and electrical equipment for abnormal use of fuel/electricity - Minimize work during high temperatures and ensure proper cover for water reservoirs	-Water and energy records and bills -Maintenance manuals and repair reports	-	- Contractor - MOLFR (during operation)	- Construction - Operation	- Daily during construction - Daily during operation	- Included in contract price - Included in operational cost of the MOLFR

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		- Review records of consumption to facilitate monitoring and adjustments						

ESS 4	- Waste & Hazardous Materials: - Soil disturbances - Excessive use of water and energy - community safety hazards from waste.	- Implement a Waste Management Plan (WMP). - Segregate waste into labeled bins (general, hazardous). - Store hazardous materials (fuel, oil, paint) in a secure, banded area. - Ensure disposal of generated solid waste (construction waste, in particular) at designated and authorized disposal site in consistence with the local and international	- WMP document - Labeled bins, secure storage area - Waste disposal records - GM complaints related to waste management	- Approved WMP in place and being implemented on-site (%) - Frequency of WMP compliance inspections conducted (weekly/monthly) - Number of labeled waste bins available and in use at the site - Number/percentage of hazardous materials stored in secure, banded areas - Number of non-compliance cases related to unsafe storage of fuel, oil, paint, etc. - Volume/quantity of waste collected and disposed of at authorized sites (per week/month) - Percentage of waste disposed of at designated and approved disposal facilities	- Contractor - MOLFR (during operation)	- Construction - Operation, where applicable	- Daily during construction - Throughout operation, where applicable	- Included in contract price - Included in operational cost of the MOLFR
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		requirements (see WBG General EHS Guidelines) - Implement waste segregation to prevent mixing hazardous and non-hazardous wastes - Identify potentially recyclable materials - Provide on-site or off-site transportation of waste to prevent or minimize spills, releases, and exposure to employees and public - Ensure mechanisms exist for		-Number of incidents of improper disposal reported Availability and condition of waste transport mechanisms (covered trucks, containers) Reduction rate in total waste generation over time Number of soil contamination incidents recorded Evidence of soil protection measures in place Frequency of environmental site inspections conducted Number of community complaints related to waste management recorded through the Grievance Mechanism (GM) %of waste-related complaints resolved within the agreed timeframe					
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		community to bring forth any complaints/feedback concerning the waste disposal by the contractor – Project GM		%Number of reported community incidents linked to improper waste handling Availability and accessibility of GM for waste-related issues (Yes/No) Number of awareness sessions conducted on GM for community members Average time taken to respond to waste-related grievances Number of workers trained on waste management and hazardous material handling Frequency of toolbox talks on waste management conducted Percentage of workforce demonstrating compliance with waste handling procedures -					
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ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
(ESS5):	- Spread of disease to the community, - physical hazards to MOLFR staff. - Improper site management; - Potential risks of intimidation, abuse, or conflict between security personnel and community members, especially	- Enforce a strict worker's Code of Conduct (CoC). - Provide workers with clean water and segregated, clean sanitation facilities. - Secure the site with fencing and clear warning signs. - Prevent unauthorized access to the site - Ensure health awareness sessions on communicable diseases. - Conduct community health and safety awareness sessions, including risks related to construction	- Signed CoCs - Site fencing, signage - Regular site inspections - Health awareness materials. - Community engagement records (sex-disaggregated) - GM posters and referral information - Training sessions - GM for complaint resolution	- Number of reported incidents of disease outbreaks among workers or nearby community - %of workers trained on CoC and health & safety protocols - Availability and functionality of clean water and segregated sanitation facilities on site - Number of community health and safety awareness sessions conducted - Number of GBV/SEA-SH awareness sessions conducted with women and vulnerable groups - Number of safety hazards identified and mitigated (e.g., lighting, fencing, access paths) - Number of security personnel trained in human rights and community engagement - Number of grievances filed and resolved through project grievance mechanism	Contractor SPCU / Social & GBV Safeguards Focal Point - Contractor and SPCU MOLFR (during operation)	Construction	Throughout construction	Included in contract price

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
	at project sites.	activities and labor influx. - Integrate GBV/SEA-SH risk awareness into community engagement and health sessions. - Ensure adequate lighting, safe access paths, and visibility around worksites to reduce risks of harassment or assault. - Publicize project GM, including confidential GBV/SEA-SH reporting channels, at community level.		- % of incidents involving security personnel appropriately addressed - Level of community satisfaction with site management and interaction with project staff (through surveys) - Compliance rate with CoC among workers (e.g., reports of harassment, abuse, or discrimination) - Frequency of site inspections and corrective actions taken for safety and security issues				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		- Conduct separate consultations and awareness sessions for women and vulnerable groups, facilitated by trained female staff where feasible. - Ensure site workers interact with communities in a respectful, non-discriminatory manner as per CoC requirements. - Train security personnel in community engagement and human rights. - Ensure security measures are proportional to the actual risks, and establish a						

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		grievance mechanism for reporting any incidents involving security personnel. Monitor the conduct of security staff regularly						

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
10	Traffic and road safety hazards	- Establish site speed limits, implement safe routes, and coordinate with local authorities. - Raise awareness on road rules and safety - Ensure appropriate GM in place	- Communication with traffic authorities - Awareness campaigns - GM	- Number of site speed limits established and communicated to staff and community. - Number of safe routes identified, mapped, and signposted. - Number of coordination meetings with local traffic authorities conducted. - Number of road safety awareness sessions held and number of participants. - Number of safety-related complaints	- Contractor and SPCU - MOLFR (during operation)	- Construction - Operation	- Throughout construction - Throughout operation	- Included in Contract price for implementation - Included in project management budget for support - Included in operational cost of the MOLFR

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
				received and resolved through GM. - Evidence of GM implementation (logs, resolution reports). - Reduction in reported traffic incidents or near misses at project sites over time.				
11	Lack of preparedness for emergencies (e.g., fire, accidents) could lead to harm to local communities	- Develop and implement an Emergency Preparedness and Response Plan (EPRP) specific to civil and excavation works.	- EPRP - Emergency drills and community participation - Fire safety equipment, surveillance/first aid	- EPRP developed, approved, and updated as per schedule - Number and frequency of emergency drills conducted per month/quarter	- Contractor and SPCU - MOLFR (during operation)	- Construction - Operation	- Throughout construction - Throughout operation	- Included in Contract price for implementation - Included in project management budget for support - Included in operational cost of the MOLFR

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		- Conduct regular emergency drills with workers and community members. - Ensure availability of functional fire safety equipment. - Ensure availability of emergency surveillance and response measures	equipment and measures	- % of workers and community members trained in emergency response - Functionality and availability of fire safety and first aid equipment (inspections logs) - Response time and effectiveness recorded during drills or real incidents - Number of reported incidents and appropriate responses taken - Community awareness level				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
				measured through periodic surveys				
12	Land Acquisition Restrictions on land use and Involuntary Resettlement (ESS5)	- Provide legally owned land with FGS documentation - Avoid forced evictions on the site. - Undertake public consultations for clearance - Implement the Project's RPF to account for any relevant case	- Leasehold, letters of ownership issued by the relevant FGS Institution. - Meetings: Work closely with the Local government.	Evidence of land ownership documentation verified by FGS authorities (lease agreements, letters of ownership) - No recorded cases of forced eviction or disputes during project implementation - Minutes and attendance lists from public consultation meetings confirming community engagement - Compliance report confirming RPF implementation for any affected persons - Number of grievances submitted and resolved related to land acquisition - Periodic monitoring visits documenting adherence to land use restrictions and resettlement safeguards	SPCU, MOLFR	- Construction	- Before commencement of works	Not applicable

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
(ESS8)	Overlooking of archaeological elements	- Adopt chance Finds as described in the S-FSRP ESMF. - Include this clause in the bidding documentation, and C-ESMP - Take the winning contractor through the procedure of the 'Chance Finds'	- Meetings, Training, Reporting	Number of contractors trained on Chance Finds procedures. - Evidence of inclusion of Chance Finds clause in bidding and contract documents. - Number of site inspections conducted to verify adherence to Chance Finds procedures. - Number of Chance Finds reported, documented, and managed according to the ESMF. - Timely submission of Chance Finds reports to NPCU/WB/SPCU	PIU, Contractor	- Construction	Throughout Construction Phase	Contractor's cost

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
(ESS 10:)	Women excluded from consultation decision-making limited access to information and grievance mechanisms; lack of effective and accessible GRM GBV risks not adequately addressed .	SEP: - Implement the project SEP, ensuring women from the Ministry are consulted. - Ensure the GM is accessible and known to all stakeholders. - Conduct separate, female-only consultations and focus group discussions facilitated by trained female staff to enable safe and meaningful participation. - Ensure representation of women, youth,	- Meetings - Awareness campaigns - SEP and communication strategies/public relations. - Consultation attendance sheets (sex-disaggregated) - GM posters and GBV referral information	- Implement the project SEP, ensuring women from the Ministry are consulted. - Ensure the GRM is accessible and known to all stakeholders. - Conduct separate, female-only consultations and focus group discussions facilitated by trained female staff. - Ensure representation of women, youth, PWDs, and other vulnerable groups in stakeholder forums and decision-making platforms. - Disclose project information in accessible formats and local languages, using channels suitable for women. - Integrate GBV/SEA-SH awareness and prevention messages into stakeholder engagement activities. - Publicize confidential GM channels, including GBV/SEA-SH reporting	- SPCU - Social / GBV Safeguards Focal Point - MOLFR (during operation)	- Construction - Operation	- Pre-construction - Construction - Operation. - Regular engagement throughout construction and operation	- One-time prior to works - Included in project management budget - Included in operational cost of the MOLFR

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		PWDs, and other vulnerable groups in stakeholder forums and decision-making platforms. - Disclose project information in accessible formats and local languages, using channels suitable for women (community meetings, radio, women's groups). - Integrate GBV/SEA-SH awareness and prevention messages into stakeholder		channels. - Collect and report sex-disaggregated data on participation and feedback. -				

ESS #	Risks/ impacts	Mitigation	Methods/ tools/ resources	Monitoring indicators	Responsibility	Project Phase	Timeline/ frequency	Cost (USD)
		engagement activities. - Publicize confidential GM channels, including GBV/SEA-SH reporting channel, during consultations and through posters and outreach materials. - Collect and report sex-disaggregated data on participation and feedback.						

Table 3 below describes the proposed plan for monitoring the sound implementation of the mitigation measures as suggested during construction and operation phases. The plan also includes the proposed monitoring indicators, methods and resources, responsibilities, timeline and frequency, as well as cost planning.

Table 3: Environmental and Social Monitoring plan

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
<i>I</i>	<i>Construction phase</i>					
1	- ESMP Implementation	- Approved C-ESMP in place. - E&S clauses included in contract. - Monthly E&S reports submitted by contractor. - No. of SEP Consultations held	- Document review - Site inspections - Monthly progress reports - meetings	- SPCU E&S Specialist, Supervising Engineer	- Monthly - As planned	- Site supervisor's salary - Environmental specialist's salary - Site visits cost imbedded in SPCU operational budget
2	- Labor & OHS Compliance (ESS2)	- Worker registers show no underage labor. - Records of OHS training and PPE distribution. - Zero major OHS incidents. - Worker GM log is maintained. - All workers and subcontractors have signed a Code of Conduct with GBV/SEA-SH prohibitions. Records of GBV/SEA-SH and	- Review of contractor's records (registers, logs). - Site inspections (PPE use, housekeeping). - Verification of signed Codes of Conduct and training attendance sheets.	- SPCU E&S Specialist, GBV Supervising Engineer, Contractor OHS Officer	Weekly inspections, monthly reporting	- Contractor's specialist salary - Site supervisor's salary - Environmental specialist's salary.

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
		labor-rights induction/refresher trainings maintained. Gender-segregated sanitation and welfare facilities available and functional at worksites. Confidential worker GM includes GBV/SEA-SH reporting channels and anonymous complaints. No reported cases of retaliation against workers raising grievances.	- Worker interviews (including female workers) to confirm awareness of GM and GBV reporting channels.			
3	- CoC & GBV/SEA/S	- Reduced cases of CoC violation - No GBV/SEA/S cases - GBV/SEA/S sensitization campaigns are in place and implemented - Dedicated GM is in place and being used. - 100% of workers and security personnel have signed Codes of Conduct with	- Inspection reports - GM records and reporting - Sensitization material and reports. - Verification of signed Codes of Conduct and training attendance sheets. - Random worker and community	- SPCU E&S Specialist, Supervising Engineer, Contractor. - GBV / Social Safeguards Focal Point	Weekly inspections, monthly reporting	- Contractor's specialist salary - Site supervisor's salary - Environmental specialist's salary.

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
		GBV/SEA/SH prohibitions. - Mandatory GBV/SEA/SH induction and refresher trainings conducted for workers, contractors, and supervisors. - Community GBV awareness sessions (including female-only forums) conducted and documented. - GBV referral pathways established and functional for health, psychosocial, and legal support.	interviews to confirm awareness of GBV reporting channels			
4	- Pollution Control (ESS3)	- Pollutants' levels are within allowed thresholds - Visual checks show minimal dust. - No community complaints about noise/dust. - Vehicle maintenance logs are current.	- Local standards for emissions and pollutants - Measurements - Visual observation - Review of GM log - Review of maintenance logs	- Supervising Engineer, - Contractor	Daily visual checks, weekly formal inspection and measurements	- Contractor's specialist salary - Site supervisor's salary - Cost of measurements included in the

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
						contract price
5	- Waste Management (ESS3 & 4)	- Waste segregation is practiced on-site. - No evidence of illegal dumping. - Hygienic conditions are prevailing - No community complaints about odor/insects/rodents	- Waste management regulations - Waste records - Site inspections - GM reports	Supervising Engineer, SPCU E&S Specialist	- Daily for site hygiene - Monthly for waste records - Weekly inspections	- Site supervisor's salary - Environmental specialist's salary.
6	- Traffic and road safety	- Speed limits are monitored - Awareness campaigns are held - Traffic related cases are reduced - Community complaints are reduced	- Traffic reports - Awareness raising reports - GM reports	Contractor in coordination with SPCU	- Daily for monitoring speed - Quarterly for reports	- Included in the Contract price - Included in SPCU operations cost
7	- Land Acquisition Restrictions on land use and Involuntary	- Land Ownership documentation	- Records/Communication	PIU	Initially before works	- Not applicable

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
	Resettlement (ESS5)					
8	- Cultural Heritage (ESS8)	- No. of incidents reported and recorded	- Reports to relevant authority(ies) - Meetings	Contractor	At land Excavation and land clearance phase	- Contractor's cost
9	- Community Health & Safety (ESS4) & Stakeholder Engagement (ESS10)	- The site is securely fenced with clear signage. - CoC signed by all workers. - Community GM is functional, and log is maintained. - Records of stakeholder consultations.	- Site inspections. - Review of CoC records and GM log.	SPCU E&S Specialist, Supervising Engineer	Weekly inspections, monthly review of GM log	- Site supervisor's salary - Environmental specialist's salary.
<i>II</i>	<i>Operation phase</i>					
10	Application of E&S instruments	- Improved E&S aspects of the project - Positive feedback from users of the building - Positive feedback from the surrounding community - M&E results	- Continuous improvement of the E&S system and human resources - Overall M&E - Monthly progress reports - Staff meetings	- MOLFR, in collaboration with SPCU	- Monthly/ Quarterly	- Included in the operational cost of the building

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
11	Labor/Employment Terms and Conditions	- Work agreements approved by the HR, and accepted by candidates - Minimal complaints - Positive staff evaluation reports - Positive health check-ups - Reduced turnover rates	- HR system, in collaboration with E&S specialists - Staff meetings - Staff evaluations - Healthcare programs - Interim reports - Workers' GM	- MOLFR, in collaboration with SPCU	- Monthly/ Quarterly/ Annually	- Included in the operational cost of the MOLFR - Included in the employment contract - Healthcare costs
12	Inclusion of women, vulnerable and minority groups	- Higher employment percentage under these categories - Minimal complaints - Minimal turnover rates - Positive health check-ups - Increased specialized facilities. - Gender- and vulnerability-disaggregated employment data available and updated. - Equal pay for equal work verified across categories. - Availability of gender-segregated	- HR system, in collaboration with E&S specialists - Staff evaluations - Healthcare programs, including rehabilitation - Interim/progress reports - Workers' GM - Worker interviews (including women and PWDs). - Review of payroll and grievance records.	- MOLFR, in collaboration with SPCU and external service providers. - Social / GBV Safeguards Focal Point	- Monthly/ Quarterly/ Annually	- Included in the operational cost of the MOLFR - Included in the employment contract - Healthcare costs

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
		sanitation, changing, and welfare facilities. - Flexible work arrangements applied where feasible (e.g., for women and PWDs). - Workers from vulnerable groups aware of GM and GBV reporting channels. - No reported cases of discrimination, harassment, or retaliation.				
13	GBV/SEA/SH	- GBV/SEA/SH Response and Action Plan is in place and maintained - Reduced number of cases - Increased level of knowledge - Dedicated GM is in place and improving. - 100% of workers, supervisors, and security personnel have signed Codes of Conduct with GBV/SEA/SH prohibitions.	- GBV/SEA/SH document - Knowledge sessions - Interim/progress reports - Staff evaluation - M&E - Workers' GM with dedicated GM. - Verification of CoC signatures and training attendance.	- MOLFR, in collaboration with SPCU and external service providers. - Social / GBV Safeguards Focal Point	- Monthly/ Quarterly/ Annually	- Included in the operational cost of the MOLFR - HR & GM costs - Healthcare and GBV support costs

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
		- Mandatory GBV/SEA/SH induction and refresher trainings conducted and documented. - Community GBV awareness sessions conducted, including female-only forums. - Confidential, survivor-centered case handling verified (no identifying data disclosed). - Functional referral pathways to health, psychosocial, and legal services established. - No retaliation cases reported against survivors or complainants.	- Review of referral records.			
14	Security personnel	- Cleared background before deployment - Signed CoC - Minimal cases - Increased level of knowledge - Dedicated GM is in place and improving	- Background checking mechanisms before deployment - Work agreements incl. CoC - Interim/progress reports	- MOLFR, in collaboration with SPCU and security authorities	- Deployment stage - Monthly and quarterly	- Included in the operational cost of the MOLFR and collaborating authorities

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
			- M&E - Workers' GM			
15	Water and energy	- Metering is within acceptable quantities - Water saving devices/fittings are used - Grey water can be reclaimed for gardening - Use of energy efficient equipment and devices - Use of alternative solar power sources - Awareness is raised - Reduced complaints	- Metering devices - Water and energy bills - Site supervision/spot checks - M&E - GM - Awareness programs and training materials	- MOLFR, in collaboration with SPCU and municipal authorities	- Monthly for bills - Quarterly for trainings - Unscheduled checks	- Included in the operational cost of the MOLFR and collaborating authorities

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
16	Pollution and waste management	- Pollutants' levels are within allowed thresholds - Waste is being managed according to municipal regulations - Waste segregation is practiced on-site - Hygienic conditions are prevailing - No community complaints about odor/insects/rodents	- Local standards for emissions and pollutants - Measurements - Waste management regulations - Waste records - Site supervision/spot checks - GM reports	- MOLFR, in collaboration with SPCU and municipal authorities	- Daily for site hygiene - Monthly for waste management - Quarterly for measurements and reporting - Unscheduled checks	- Included in the operational cost of the MOLFR and collaborating authorities
17	Traffic and road safety	- Speed limits are monitored - Awareness campaigns are held - Traffic related cases are reduced - Community complaints are reduced	- Traffic reports - Awareness raising reports - GM reports	- MOLFR, in collaboration with SPCU and traffic authorities	- Daily for monitoring speed - Quarterly for reports	- Included in the operational cost of the MOLFR and collaborating authorities
18	Emergency Preparedness	- EPRP is in place, used, and maintained - Fire safety equipment is in place - Other emergency surveillance equipment and measures are in place	- EPRP - Incident reports - Training and drills reports	- MOLFR, in collaboration with SPCU and civil defense authorities	- Daily and monthly for checking - quarterly for reporting - Annual for training and drills	- Included in the operational cost of the MOLFR and collaborating authorities

#	Monitoring aspects (<i>what to monitor?</i>)	Monitoring indicators	Methods/ tools/ resources	Responsibility	Timeline/ frequency	Cost (USD)
		- Emergency drills are held - Related cases are reduced				

Table 4 below describes the key requirements for capacity building plans, including targeted staff, topics, timeline, types of training, resources, and cost estimates.

Table 4: Capacity Building Plan

Target Staff	Topic	Timeline/Frequency	Type of Training	Resources	
Contractor	- E&S Clauses mandatory in the bids	Before bidding submission	Indoor training	SPCU E&S Specialists	P
Contractor's Project Manager, Project Engineer, and OHS/E&S Officer and Foreman	- C-ESMP Implementation - OHS Procedures & Emergency Response - Waste Management Plan - Worker & Community GM	At project start-up	F2F Workshop / On-site training	SPCU E&S Specialist	1 th th B c
SPCU E&S Specialist & Supervising Engineer	- Supervising and Monitoring the ESMP - World Bank ESF requirements - Reviewing contractor reports	At project outset, quarterly refresher	F2F Workshop / Online course	WB E&S Specialists, external consultant	P b
All Construction Workers	- OHS (use of PPE, site safety rules) - Worker Code of Conduct - Worker GM Introduction, GBV/SEA/SH Prevention, sub project Security management	At induction & weekly toolbox talks	On-site toolbox talks	Contractor's OHS Officer	I

Implementation Arrangements

7.1. Government Responsibilities

The overall responsibility for the works sits with the Ministry of Livestock, Forestry and Range (MoLFR) as the main recipient and implementer of the project. The work is overseen by the State Project Coordination Unit (SPCU) embedded within the Project's institutional structures. The SPCU will contract contractors to undertake the construction of the office block. The construction company will implement the project including all Environmental and Social (E&S) mitigation measures defined in this ESMP, for the office building.

Below is the list of Government institutions involved in the implementation, with their respective roles and interests.

Table 5: Institutional partners' responsibilities

MoLFR	The MoLFR is responsible for the overall implementation of the Project including monitoring of implementation of this ESMP.
MoECC	The ministry of environment and climate change will be coordinated in matters relating state level regulatory frameworks on environment, oversight on environmental standards and other related aspects.
NPCU	On biweekly bases NPCU will be updated on the implementation progress during the E&S meeting. Progress report will be shared on monthly bases. The NPCU will provide overall guidance and technical backstopping when and where necessary. E&S team at national level will also handle sensitive GM cases submitted by the SPCU.
SPCU	SPCU Engineers and E&S safeguard team have prepared the design for the works and this ESMP. They will oversee the implementation of the works by the contractor and supervise implementation of the environmental and social management plan
Contractor (see below for detail)	- The contractor will implement the works based on the agreed design by adopting best construction codes and most environmentally-sound design measures - The Contractor will prepare a Contractor's ESMP (C-ESMP) before commencing work, by adopting all pertinent E&S management measures in this site-specific ESMP, and customizing them according to the site and work specifics - The Contractor will be responsible for implementing their C-ESMP throughout the contract lifetime.

7.2. Contractors and Sub-contractors

The contractor is responsible for complying with requirements for all field activities covered by this ESMP, the contractor is also responsible for ensuring that all its sub-contractors follow the ESMP and other ESF instruments that apply to this subproject. The contractor will have contractual clauses specifying compliance with the mitigation measures listed in the ESMP and in the WBG EHS Guidelines, in addition to national requirements and to indicate measures taken in cases of non-compliance. The contractor is also responsible for the actions of any sub-contractors they may engage. Sub-contractors also have to comply with all E&S standards as laid out in this ESMP. The contractor's responsibilities include:

- Ensure that all operations comply with the mitigation measures laid out in this ESMP, for which the contractor is responsible.
- Ensure that the control measures provided for in the ESMP are both understood and implemented by site personnel.
- Comply with accident and incident reporting as laid out in the ESMF. All severe incidents must be reported through SPCU to the Bank within 48 hours of occurrence.
- Set up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies.
- Monitor the ESMP implementation, against the monitoring indicators laid out in this ESMP and the C-ESMP.
- Participate in community consultative meetings.
- Identify additional significant matters pertaining to environmental and social compliance.
- Liaise with SPCU on the need for corrective action in the event of unexpected environmental or social problems emerging during the course of operations.
- Communicate with all staff regarding E&S compliance requirements and other matters of importance.
- Identify additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Prepare and share periodic reports on all aspects of E&S compliance.
- Maintain lists of all workers, including their age and gender including attrition levels.
- Develop and maintain a workers' grievance mechanism.
- Prepare and maintain an OHS Plan and provide training to all workers on OHS Plan.

- Ensure signing of code of conduct by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.
- Implement the Security Management Plan.
- Undertake workers training on OHS, GM and SEAH
- Undertake periodic stakeholders 'engagements with the local communities.

The contractor is obliged to implement this ESMP with all risk mitigation measures assigned to it.

E&S Safeguards or Environmental Health and Safety (EHS) Specialist: The contractor will deploy an E&S or EHS Specialist as an addition to the team to ensure operationalization of this ESMP, including monitoring, supervision and reporting on mitigation measures. The key tasks of the Specialist include the following.

- Ensure PPE for workers is available and workers are trained in its use
- Provide OHS training to all workers, based on the OHS Plan
- Ensure health and safety of all workers at the construction site
- If necessary, stop the works to ensure safety
- Maintain records of accidents and incidents and ensure appropriate reporting of incidents to SPCU
- Ensure waste management procedures are followed closely
- Ensure availability of water and sanitation facilities for all workers at site and at the campsite
- Conduct toolbox talks for workers
- Train all workers in the CoC and ensure that CoC is signed by every worker
- Liaise closely with the SPCU on training workers on GBV issues, as well as community awareness on GBV
- Maintain workers 'lists indicating age and gender
- Maintain records of Workers 'GM

Table 6 below shows key requirements for reporting implementation of the ESMP throughout construction, which will also extend throughout the life cycle of the subproject.

Table 6: Reporting Plan

Reporting Description	Who? (From)	To Whom? (To)	How?	When? (How frequent?)
Serious OHS Incident (fatality, serious injury)	Contractor	SPCU E&S Specialist / Supervisor	Telephone call, then email report	Immediately (within 24 hours)
GBV/SEA/SH cases/incidences	Contractor	SPCU	Report (Use of the reporting format)	Immediately in 24 hours
Monthly E&S Compliance Report	Contractor	SPCU E&S Specialist / Supervisor	Formal written report	Monthly
GM Log & Status Update	Contractor / GM Focal Point	SPCU E&S Specialist	Email / Report	Monthly
Quarterly Project Progress Report (with E&S section)	NPCU	World Bank	Formal report via official channels	Quarterly
Sub project progress report	PM	NPCU/DG MOLFR	Progress Reports	Quarterly

8. Public Consultation and Feedback

Stakeholder engagement is essential for the project's success, driven by the requirements of the Ministry of Livestock, Forestry and Range Management. However, consultations have been and will continue to be held with key stakeholders, primarily the management and staff of the Ministry of Livestock, Forestry and Range (MoLFR), as they are the main beneficiaries and will be present on the site during construction.

The Consultations Held on the Subproject:

A stakeholder consultation was conducted on 4th September 2025 at the MoLFR Office as part of ongoing project engagement and safeguard implementation under the World Bank Environmental and Social Framework (ESF). The session brought together 20 participants, 4 female, 14 male, and 2 youth representing MoLFR leadership, departmental heads, project engineers, the SPCU, and administrative staff.

Before stakeholder invitation to the consultation meeting, stakeholder identification of the activity was mapped looking at their influence, interest, relevance and impact to the proposed subproject. In this exercise the SPCU maps out all concerned institutions and groups to ensure inclusivity and encourage participation. In this case, the ministry of MoAI, MoECC, MoWHR, MoPWHT MoEWR, Dhusamareb municipality and residents have been identified as stakeholders to be invited and consulted. An invitation message notifying their participation with the meeting is sent to all stakeholders indicating meeting agenda, date, location and any other related logistics.

The meeting therefore, brings together all these stakeholders ensuring inclusivity and participation of different segments of the community including men, women, youth and the persons with disability. Having this inclusivity in the table makes the meeting captures all areas of interests. The meeting provides this platform to listen to different views, concerns and recommendations of the different groups attended. The areas focused include environmental and social risks as well as their impacts.

In the meeting, the stakeholders discussed the following elements

- Disclose project information including; the nature, scope, objective and duration so that stakeholders are fully informed and equally updated.
- Present the environmental and social screening report conducted from the subproject site. This gives a snapshot of the E&S-related risks and their impacts.
- Discuss on the site-specific potential risks and impacts whilst also presenting the actionable mitigation and management strategies to ensure the project's compliance with the bank's guidelines including ESMF and relevant Environmental and social Standards.
- Outline institutional roles and responsibilities in the implementation, monitoring and reporting during the subproject phases.
- Setup a coordination mechanism so that stakeholders catch up when matters either on monthly or quarterly bases and on ad hoc bases when deemed necessary.

Actions agreed – outcome

- The consultation aimed to review project progress, validate safeguard implementation measures, and ensure inclusive participation in decision-making.
- Participants discussed the project’s scope and updated implementation timeline, emphasizing adherence to ESF compliance standards. Key topics included review of safeguarding screening results, worker management protocols, and measures to minimize operational disruptions during construction.
- Discussions also focused on enhancing inclusivity and accessibility within project design, establishing a staff grievance mechanism, and reinforcing Occupational Health & Safety (OHS) measures to protect employees during project execution.
- Ministry leadership reaffirmed their commitment to continuous monitoring, transparency, and adherence to safeguard standards.
- The participants agreed on several priority actions, including appointing a dedicated Safeguard Focal Point, finalizing and disseminating the updated safeguarding screening report, operationalizing the grievance mechanism, and integrating inclusivity and safety provisions into design and procurement processes. The consultation concluded with consensus to incorporate stakeholder feedback into the forthcoming safeguard monitoring framework and project progress reports.

As part of the wider engagement, the project team also conducted stakeholder management and outreach with nearby neighbors, including the High Court, to ensure mutual understanding of construction activities, expected impacts, and mitigation measures. In addition, engagement sessions were held with the Ministry of Public Works, Housing & Transport to formally inform them about the project scope, planned works, and related environmental and social safeguard obligations. The team further communicated the project’s grievance mechanism, hotline number, and disclosure responsibilities to ensure transparency and accessibility for all affected stakeholders.

10. Grievance Mechanism

One of the key objectives of ESS10 (Stakeholder Engagement and Information Disclosure) is to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the borrower to respond and manage such grievances. This Project GM facilitates the S-FSRP Project to respond to concerns and grievances of project-affected parties related to environmental, social, labor, and health and safety performance. The GM ensures that grievances are addressed transparently, fairly, and inclusively, with particular attention to women, persons with disabilities, and vulnerable and marginalized groups.

The Ministry of Livestock, Forestry, and Range (MoLFR) has the primary responsibility to resolve all Project-related grievances in accordance with Somali law and the World Bank ESSs. The GM process is accessible to all stakeholders, including workers, project-affected communities, and MoLFR staff.

10.1 GM Structure and Responsibilities

10.1. Workers' Grievance Mechanism (WGM):

A dedicated WGM will be established to address grievances from project workers, including contracted laborers, temporary staff, and consultants. This mechanism will:

- Receive grievances directly from workers through in-person reporting, phone, email, suggestion boxes, or site-level focal points.
- Ensure anonymity and protection against retaliation.
- Escalate unresolved or complex cases to the SPCU Social Safeguards Specialist or NPCU E&S Team.

10.1. 2. Contractor-Level GM:

- Contractors will establish site-specific GMs to handle minor complaints related to construction activities.
- Sensitive or complex cases are escalated to SPCU.
- Contractors will appoint a trained site-level grievance focal point experienced in gender-sensitive and GBV-responsive grievance handling.

10.1. 3. SPCU GM Management:

- The SPCU Safeguarding Team, led by the Social Safeguards Specialist, manages grievances escalated from contractors or workers.
- Grievances are categorized, logged, and addressed confidentially within defined timelines.
- Complainants receive feedback on resolution actions.

10.1.4. SPCU (State-Level) GM

- The Social Safeguards Specialist manages grievances that cannot be resolved at the site level.
- Grievances received via hotline, email, phone, or in-person will be logged, acknowledged, and resolved confidentially within defined timeline

10.1.5. NPCU (National-Level) GM

- Escalated sensitive or major cases will be handled by the National Project Coordination Unit (NPCU) Environmental and Social (E&S) Team.
- NPCU provides guidance, ensures consistency with ESS requirements, and communicates resolutions back to the SPCU for implementation.

10.1.6. Channels of Communication

Grievances may be submitted through multiple accessible channels:

- Direct communication with GM focal points (SPCU or contractor)
- Suggestion/complaint boxes at visible and safe locations accessible to women, elderly, and persons with disabilities
- Dedicated project email address
- Publicized toll-free hotline numbers (including MoLFR's existing GM channel: dial 3060)
- Anonymous submissions are permitted; protection against retaliation is guaranteed

10.1.7. Accessibility Measures for Vulnerable Groups:

- Complaint boxes located at visible and accessible sites, including areas safe for women and persons with disabilities.
- Option for anonymous submissions via phone or email.
- Flexible reporting methods (in-person, digital, or through community representatives).

10.1.8. GM Awareness and Communication Plan

- Awareness campaigns will be conducted for both workers and communities prior to project commencement and periodically during implementation.
- Information will be disseminated via community meetings, posters, brochures, and digital channels, emphasizing:
 - I. GM channels and procedures
 - II. Rights of complainants, including anonymity and protection from retaliation
 - III. Special provisions for women, persons with disabilities, and vulnerable groups

10.1.9. Training and Capacity Building

SPCU social specialists will train project officers, contractor staff, and community focal points on:

- Complaints handling and reporting
- Confidentiality, survivor-centered approaches
- GBV/SEA-SH case management procedures
- Risk-based categorization and escalation

10.1.10. GM Submission Channels

Grievances may be submitted through multiple channels:

- Direct in-person communication with GM Focal Points or Contractor representatives.
- Email to dedicated project addresses.
- Suggestion/complaint boxes at project sites.
- Publicized toll-free hotline numbers.

10.1.11. For GBV/SEA-SH complaints:

- A **confidential, survivor-centered reporting channel** will be established.
- Contractors **will not investigate** these cases.
- Cases are referred to health, psychosocial, and legal services per the GBV Action Plan.

10.1.12. Grievance Process and Risk-Based Categorization

- All grievances are logged in a structured database with categories: environmental, social, labor, OHS, GBV/SEA-SH, and security-related.
- Grievances are classified based on severity, urgency, and potential impact to prioritize responses.
- Complaints are acknowledged within **three (3) working days**.

- Proposed resolution is provided within fifteen (15) working days, with extensions documented and communicated when necessary.
- Non-GBV complaints are managed with confidentiality to protect personal information while allowing necessary follow-up.

A visual GM procedure map is provided in **Annex X** (attached) illustrating submission, logging, categorization, escalation, resolution, and closure steps.

10.2. Integration with Other Management Systems

- GM is integrated with OHS, environmental, labor, and security management systems, ensuring linkages between grievances and corrective actions in ESMP, Labor Management Plans (LMP), and Site Safety Plans.
- Corrective Actions: GM outcomes are tracked and used to update ESMPs, SOPs, and other project management documents.

10.3. Reporting and Public Disclosure

- Grievance data will be **monitored and reported periodically**, disaggregated by gender and vulnerability status.
- GM performance, including number of grievances received, resolved, and pending, will be **publicly disclosed** in project progress reports and on the project website.
- Complainants are informed of their right to **appeal within the project GM** or escalate to the **World Bank Grievance Redress Service (GRS)** if dissatisfied.

10.4. Closure and Follow-Up

- Each grievance will be **formally closed** once resolution is confirmed with the complainant.
- If additional time is required, a documented **extension** is communicated to the complainant.
- Outcomes are linked to **corrective actions** and updates to project ESMP or other relevant plans.

10.5. Flowchart and Procedure Map

The GM process is visualized in a procedure flowchart, showing:

1. Grievance submission (site, SPCU, email, hotline)
2. Logging and categorization (risk-based)
3. Acknowledgment within 3 working days
4. Resolution at contractor/SPCU/NPCU levels
5. Feedback to complainant
6. Escalation to higher levels or World Bank GRS if unresolved
7. Closure and integration with corrective actions and ESMP updates

10.5 Summary of Grievance Mechanism (GM)

Key Elements in GM	How will be addressed
Objective of GM	Provide accessible, inclusive, transparent, and fair mechanisms for project-affected parties to raise and resolve grievances related to environmental, social, labor, OHS, and GBV issues in line with ESS10.
Institutional Responsibility	MoLFR leads GM implementation, supported by Contractors, SPCU (state level), and NPCU (national level).
GM Structure and Responsibilities	Multi-tier system comprising WGM, Contractor-level GM, SPCU GM, and NPCU GM for escalation.
Workers' Grievance Mechanism (WGM)	Dedicated channel for workers ensuring confidentiality, non-retaliation, and escalation of unresolved cases.
Contractor-Level GM	Site-level mechanism for minor grievances with trained focal points; escalates complex cases to SPCU.
SPCU GM Management (State-Level)	Manages, logs, categorizes, and resolves grievances confidentially within defined timelines and provides feedback.
NPCU GM Management (National-Level)	Handles sensitive/complex cases, ensures ESS compliance, and provides oversight and guidance.
GM Submission Channels / Communication	Multiple channels including in-person, phone, email, hotline (3060), suggestion boxes, and anonymous submissions.
Accessibility Measures for Vulnerable Groups	Ensures inclusive access through safe reporting channels, flexible methods, and support for vulnerable groups.
GM Awareness and Communication Plan	Awareness campaigns using meetings, materials, and digital tools to inform stakeholders of GM procedures and rights.
Training and Capacity Building	Training on grievance handling, confidentiality, GBV response, and risk-based approaches for all relevant actors.
GBV/SEA-SH Grievance Handling	Separate, confidential, survivor-centered mechanism with referral to specialized service providers.
Grievance Process and Timeline	Structured process: submission → logging → categorization → acknowledgment (3 days) → resolution (15 days) → feedback → closure.
Risk-Based Categorization	Grievances classified by severity, urgency, and type (E&S, labor, OHS, GBV, security).
Integration with Other Management Systems	Linked with ESMP, LMP, OHS, and security systems; informs corrective actions and project improvements.
Reporting and Public Disclosure	Regular reporting and public disclosure of GM performance, disaggregated by gender and vulnerability.
Closure and Follow-Up	Formal closure upon confirmation; extensions communicated; outcomes linked to corrective actions.
Escalation Mechanism	Escalation from contractor → SPCU → NPCU → World Bank GRS if unresolved.
Confidentiality Protocols	Ensures confidentiality for all cases, with enhanced protection for sensitive and GBV-related complaints.
GM Tools and Documentation	Uses structured database, templates, and a GM flowchart (Annex X) for systematic tracking and management.

11. ESMP Implementation Budget

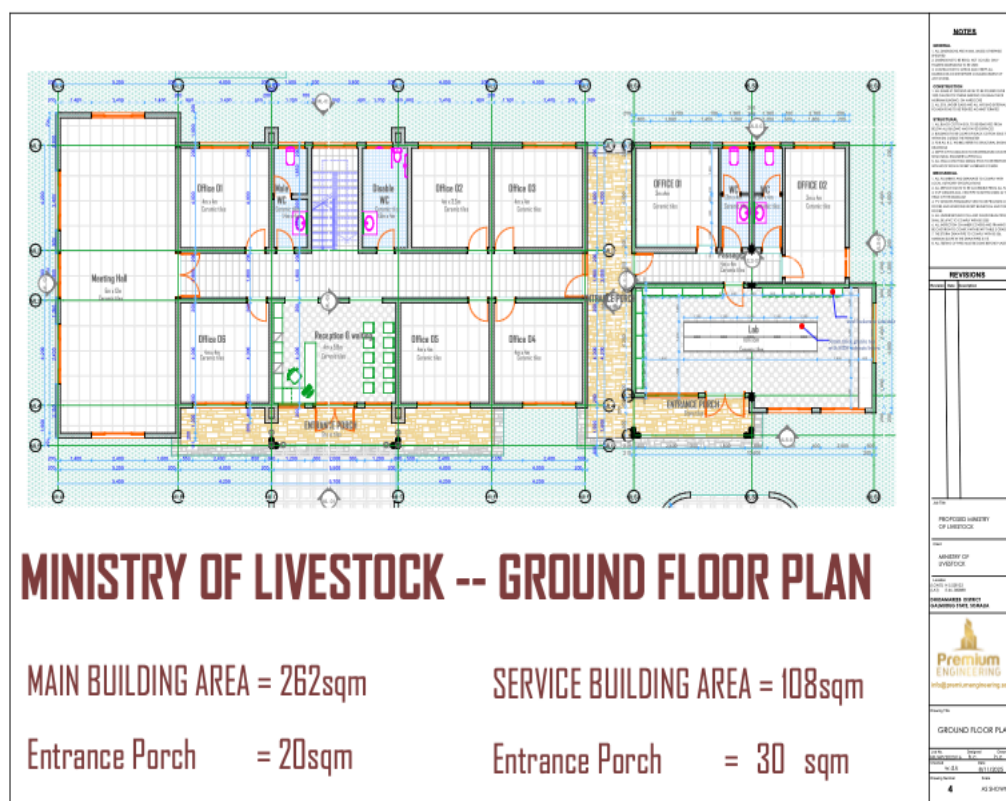
The implementation of this Environmental and Social Management Plan (ESMP) shall be fully integrated into the Contractor's scope of work. Accordingly, the Contractor is required to incorporate the ESMP implementation budget into the Bill of Quantities (BoQ) as part of their contract price. This shall cover all environmental, health, and safety (EHS) management requirements during the sub-project life cycle, including staff, training, PPE, monitoring, stakeholder engagement, and other related safeguard measures necessary for effective ESMP compliance.

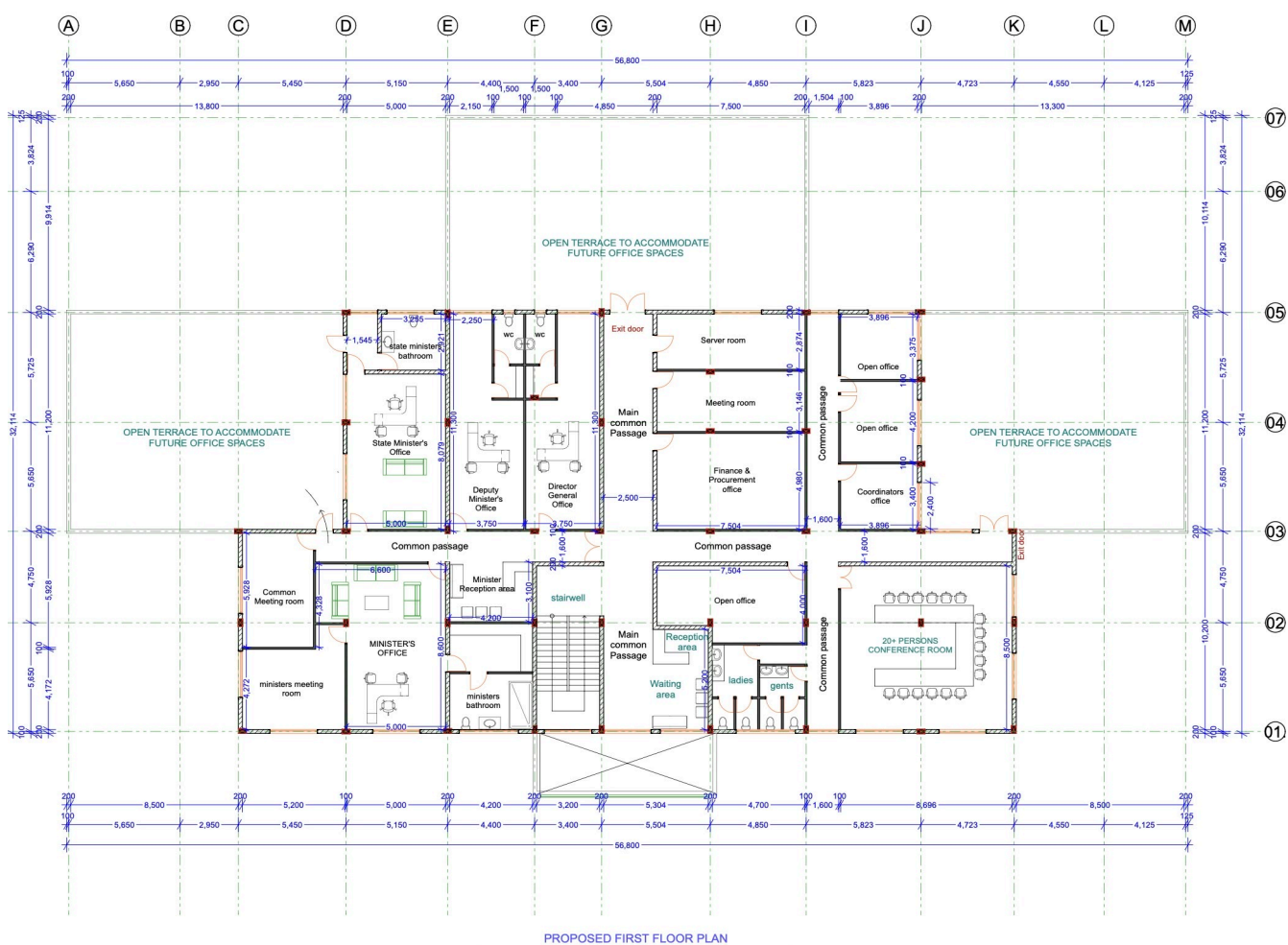
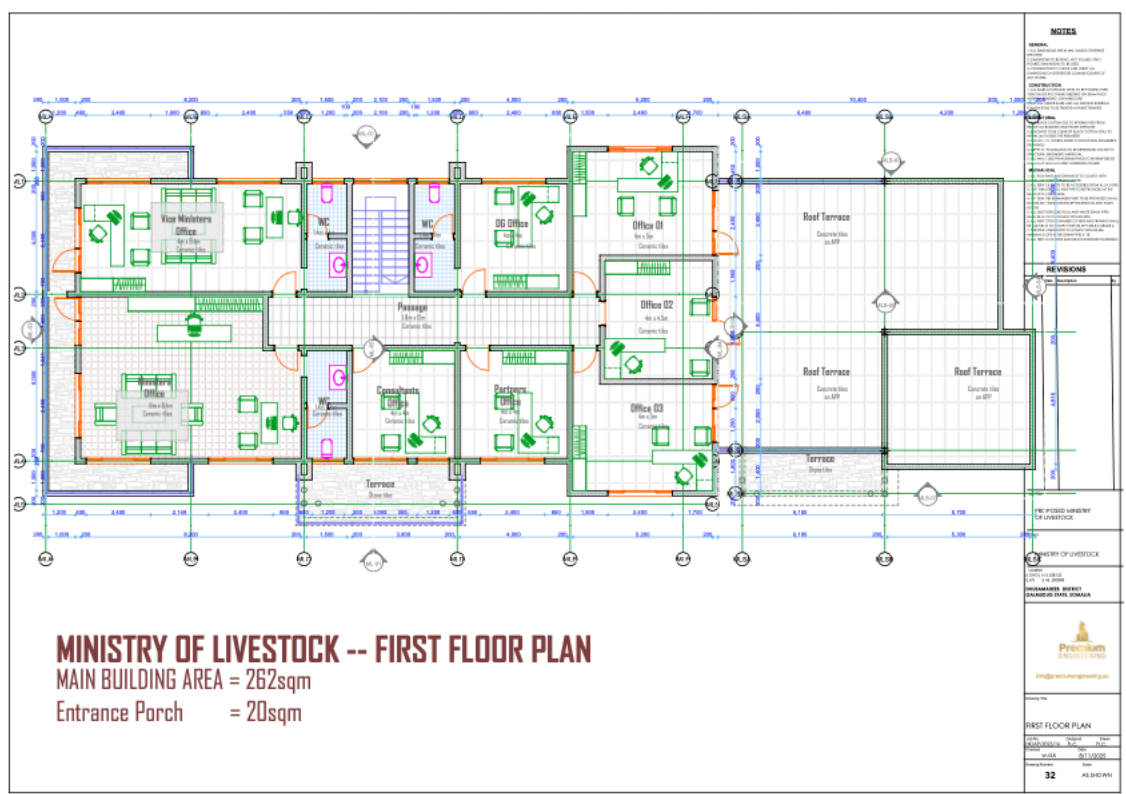
All costs associated with the preparation and implementation of the Contractor's Environmental and Social Management Plan (C-ESMP) shall therefore be borne by the Contractor and reflected within the BoQ under relevant sections, ensuring that no separate budget allocation is required for ESMP implementation outside the contract value.

Topics	Target institutions/groups	Responsible entity	Budget
EHS induction training and safety toolbox talks,	Site workers	SPCU & MoLFR	1200
Emergency Preparedness and Response Plan (EPRP)	the EPRP will be prepared in line with project guidelines	SPCU	2500
Stakeholder and public consultations meetings	Resident community, MoLFR staff and contractor	SPCU	6000
Environmental and Social Grievance Mechanism (E&S GM),	Site-specific GM will be established and GM sensitization sessions will be conducted	Contractor & SPCU	3000
GBV/SEA/SH prevention and response services;	All workers	SPCU E&S team	2500
Total			\$15200

12. References

- The World Bank Environmental and Social Framework (ESF), 2018
- The World Bank Group General Environmental, Health, and Safety (EHS) Guidelines, 2007
- Project-level Environmental and Social Management Framework (ESMF)
- Sub-project Bill of Quantities (BoQ) for MoLFR Office Building





Annex 2: Land Ownership

<i>Jamhuuriyadda Faderaalka Soomaaliya</i> Dowlad Goboleedka Galmudug Xafiiska Madaxweynaha	 Galmudug State Office of The President	جمهورية الصومال الفدرالية حكومة اقليم جلمدج مكتب الرئيس
Tix:XMGM/05/250	Tar:03/05/2025	
KU: Guddoomiyaha Caasimadda Dhusamareb	=Dhusamareb	
Ujeedo: Wareejin Dhulka Wasaaradda Gaadiidka Cirka iyo Dhulka		
Mudane Gudoomiye,		
Sida ku cad ujeedada kor ku xusan iyo anagoo tixraaceyna warqadda sumadeedu tahay REF:WXXDDGM/095/25 oo ah codsi inooga yimid Wasaaradda Xanaanada Xoolaha, Dhirta iyo Daaqa, waxaa lagu farayaa in aad xaruntii hore Wasaaradda Gaadiidka Cirka iyo Dhulka ku wareejiso Wasaaradda Xanaanda Xoolaha Dhirta iyo Daaqa.		
Wasaaradda Xanaanada Xoolaha, Dhirta iyo Daaqa waxaa lagu wareejinayaa dhulka kor ku xusan oo cabbirkiiisu yahay 47x70, si ay howlaha shaqo ugu gudato, adeegyada kala duwan bulshada u gaarsiiso, qeybna uga noqoto horumarka Dowladda Galmudug.		
Sidaa darteed Mudane Gudoomiye waxaan kaa rajaynayaa inaad u dedejisid shaqadaan Mahasanid.		
Madaxweynaha Dowlad Goboleedka Galmudug Mudane, Axmed Cabdi Kaariye (Qoor)		
		
Madaxtooyada Galmudug, Dhuusamareeb	Email: Presidency@statehouse.gm.so	

JAMHUURIYADDA FEDERAALKA
SOOMAALIYA
DOWLADGOBOLEEDKA GALMUDUG
**MAAMULKA CAASIMADDA
DHUUSAMAREEB**
Xafiiska Gudoomiyaha Degmada ahna
Duqa Caasimadda Dhusamareeb



جمهورية الصومال
القدراية
الدولة الإقليمية جلمدج
إدارة طوسمريب
مكتب رئيس بلدية

SUMAD: DGG/XGDCDH/ 001262/2025

Tar: 04-05-2025

KU:Wasaaradda Xanaanada Xoolaha Dhirta iyo Daaqa Galmudug

=Dhusamareeb=

Og: Madaxwaynaha Dowladda Galmudug

=Dhusamareeb=

Ujeedo: CADDAYN BIXIN DHUL DANGUUD AH

Guddoomiyaha Degmada ahna duqa caasimadda Dhusamareeb

Markuu arkay: Qodobka 24aad ee sharciga Dowladaha Hoose ee golyaasha deegaanka Dowladda Galmudug.

Markuu arkay: Muhiimadda ay leedahay in Wasaaradda Xanaanada Xoolaha, Dhirta iyo Daaqa Dowladda Galmudug, ay hesho dhul ay ka dhisato xaafiisyadii wasaaraddu ugu adeegi lahayd bulshada Reer Galmudug.

Markuu tixgaliyay: Codsiga Wasaaradda Xanaanada Xoolaha, Dhirta iyo Daaqa Dowladda Galmudug.

Markuu latashaday: Gudoomiye ku xigeenka & Xoghayaha Maamulka Caasimadda Dhusamareeb.

Wuxuu Go'aamiyay

Qodobka 1aad

Gudoomiyuhu wuxuu bixiyay Dhul cabirkiisu dhan yahay **47x70m =3,290M²**, oo ku yaala Xaafadda Horseed, Agagaarka Xarunta Nabadsugidda Galmudug, lana siiyay **Wasaaradda Xanaanada Xoolaha, Dhirta iyo Daaqa Dowladda Galmudug**, si wasaaraddu uga dhisato xaafiisyadii bulshada Galmudug ay ugu adeegi lahayd.

Jihoyinka Dhulka

- | | |
|---|---|
| 1. Bari waxaa ka xiga Waddo | 2. Galbeed waxaa ka xiga Dhul Dad. |
| 3. Waqooyi waxaa ka xiga Wadada Lamiga | 4. Koofur waxaa ka xiga Dhul Dad. |

Qodobka 2aad

Waxaa lugu wargalinayaa hay'adaha ay qusayso warqadaani in sidaas ay ula socdaan, sidoo kale waxaan codsanayaa in ay kuna gacan siiyaan wasaaradda sidii xarunteeda u dhisan lahayd.

Mahadsanidiin

Cabdiraxman Cali Maxamed (Geeda qorow)

Guddoomiyaha Degmada Ahna Duqa Caasimadda Galmudug ee Dhusamareeb



Xafiiska Gudoomiyaha Degmaa- ahna duqa Caasimadda
Dhusamareeb – Galmudug – Somalia
Email: Info@dusamareeb.gm.so
Xiriir No: 252614684444 +252624684444

Annex 3: Brief description of the applicable ESSs

The Environmental and Social Framework (ESF)¹ sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards. Below is a short summary of the relevant Environmental and Social Standards (ESSs) for this sub-project²:

ESS 1: Assessment and Management of Environmental and Social Risks and Impacts. ESS1 sets out the Client'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 Environmental and Social Standards (ESSs). This ESS is relevant to this sub-project, and E&S risks and impacts are managed through this ESMP.

ESS 2 – Labor and Working Conditions. ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers.

ESS 3 – Recourse and Efficiency, Pollution Prevention and Management. ESS3 recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle consistent with Good International Industry Practice (GIIP).

ESS 4 – Community Health and Safety. ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or

¹ World Bank, Environmental and Social Framework (ESF), 2018.

² ESS 7 and 9 do not apply to this project. There are no population groups that are included in the relevant criteria of ESS 7..

intensification of impacts due to project activities. Key risks and impacts of the sub-project in regards to community health and safety relate to GBV/SEA-H, pollution and security. Consistent with this, ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. Risk mitigation measures are listed in this ESMP.

ESS 5 – Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement. ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause 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. The term “involuntary resettlement” refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement. Experience and research indicate that physical and economic displacement, if unmitigated, may give rise to severe economic, social and environmental risks: production systems may be dismantled; people face impoverishment if their productive resources or other income sources are lost; people may be relocated to environments where their productive skills are less applicable and the competition for resources greater; community institutions and social networks may be weakened; kin groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help maybe diminished or lost. For these reasons, involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

ESS 8 – Cultural Heritage. ESS8 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. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle.

ESS 10 – 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. Stakeholder engagement has been undertaken for this sub-project, as listed in the section on consultations.

STAKEHOLDERS CONSULTATION MEETING

State Project coordination unit have held a consultation meeting for the construction of the Ministry of Livestock, Forestry and Range (MoLFR) Head Quarter (HQ) in Dhusamareb district of Galmudug. The meeting was held in February 5th, 2026 in the ministry's current office.

The meeting brings together, the ministry leadership, staff, ministry engineers, the SPCU staff.

Key issues discussed in the meeting

1. Overview, objective, scope and timeline of the proposed project activity was shared and discussed with ministry.
2. Design, subproject description and sub-components was presented in the meeting to ensure mutual understanding and smooth implementation throughout.
3. The land ownership letter and official confirmation certificate from Dusamareb municipality was presented to ensure no disputes involved. Therefore, the land was unanimously cleared.
4. Possible potential and site-specific environmental, social risks and impacts have been looked at. The SPCU safeguard team presented the Environmental and social screening assessment report. This report also outlined possible Gender-Based Violations (GBV), Sexual Exploitation and Abuses (SEA) and Sexual Harassment (SH) involved in the construction of the MoLFR HQ.
5. Roles and responsibilities of different institutions involved in this project was discussed. Also, coordination mechanism of all institutions set and agreed.
6. The meeting highlighted the implementation of the subproject should be implemented in line with FSRP project manuals and guidelines including Environmental and social management frameworks (ESMF) and subproject-specific Environmental and social standards (ESS).

Participants

The meeting was attended by MoLFR ministries, director generals, staff, engineers and the SPCU with 20 participants including 14 males and 6 females. The consultation ensured the inclusion of objective of the project with 30% of the participants being females.

Outcome – minutes

After in-depth and fruitful discussions, the following have been agreed.

- The ministry has immensely appreciated the support FSRP to construction a higher standard and modern HQ for the ministry. This infrastructure development will expand service delivery.
- The meeting highlighted importance of construction of MoLFR HQ with modern designs, offices, spaces for smooth operation.
- In close collaboration with SPCU and the constructors, the overall responsibility of the subproject implementations was agreed to be taken by the ministry of livestock, forestry and range.

- The implementation of the proposed subproject should be in accordance with FSRP environmental and social frameworks and standards. The compliance should be regularly monitored, corrective action to be taken where under performance observed.

Photos Taken During Consultation Meeting





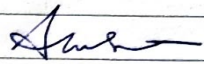
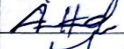
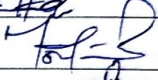
Attendance Sheets Recorded from the consultation meeting



Activity: Consultation meeting on the Construction of MolFR HQ - Dusamareeb

ATTENDANCE SHEET

SN	Name	Phone Number	Gender	Location	Institution	Signature
1.	Abdullahi Abdirahman Husien	615160300	M.	Dhusamareeb	Minister (MolFR)	[Signature]
2.	Sherif Abdirahman Bare	615042643	M.	Dhusamareeb	D. Minister (MolFR)	[Signature]
3.	Sulaimon Mohamed Salah	615579779	M.	Dhusamareeb	D. Gen. (MolFR)	[Signature]
4.	Abdikarim Mohamed Hersi	615533397	M.	Dhusamareeb	FSRP-coordinator	[Signature]
5.	Tahjil Abi Ahmed	615579599	M.	Dhusamareeb	MolFR-	[Signature]
6.	Guliel Abi Ahmed	613936604	M.	Dhusamareeb	FSRP-P	[Signature]
7.	Mohamed Abdirahman Ali	616622955	M.	Dhusamareeb	FSRP-CH	[Signature]
8.	Abdirisag Saleh Shudane	615973072	M.	Dhusamareeb	MolFR-	[Signature]
9.	Fuheyba Abdi Barn	616394606	F	Dhusamareeb	MolFR	[Signature]
10.	Husein Nur Lorch	615116461	M.	Dhusamareeb	MolFR-	[Signature]
11.	Abdullahi Adinur Haji	615760068	M.	Dhusamareeb	MolFR	[Signature]

12.	Amir Tahiri Farah.	617645019	F	Dh.	MOLFR-staff	
13.	Khadiro Nur Dahir.	617370429	F	Dhusomareb	MOLFR	
14.	Isidawo Abdi Ahmed.	770522554	F	Dhusomareb	MOLFR	
15.	Abdimahad Yusuf Farah.	615249652	M	Dhusomareb	FSRP	
16.	Abdigadii Abdullahi Abdi.	615506676	M.	Dhusomareb	FSRP	
17.	Hassan Omar Mohamed	618901716	M.	Dhusomareb	MOLFR-staff	
18.	Rahmo Ahmed Hussein	619160640	F	Dhusomareb	MOLFR-staff	
19.	Ubah. Saad Aman	616342885	f	Dhusomareb	MOLFR-staff	
20.	Nur Abdi Tuman	613339522	M.	Dhusomareb	MOLFR-staff	

Prepared by:

Name: Abdulkadii Abdulkadii AdhTitle: E. SpecialistSignature: Date: 05/02/2026

Approved by:

Name: Abdutarim Mohamed HersiTitle: Project Coordinator

Signature & Stamp:

Date: 05/02/2026

Annex 4: MOLFR- Office Building for E&S Screening

Social and Environmental Screening: FSRP	
Projects are screened for their inherent social and environmental risks regardless of planned mitigation and management measures. It is necessary to identify potential inherent risks in the event that mitigation measures are not implemented or fail. This means that risks should be identified as if no mitigation or management measures were to be put in place.	
SECTION A: General Information	
Date of screening	20 August 2025
Activity/Sub project title	Construction of headquarter Office Building works for MOLFR Galmudug State
Activity/Sub project component	Institution building capacity
Implementing Partner	N/A
Proposed activity budget	999,736 USD
Proposed activity duration	12 Months
ES Screening Team Leader and Contact Details	
ES Screening Team Members	Eng Ahmed Abdihakim Mohamed
Site/Activity location	MOLFR
New/Rehabilitation project	New
Project Description. Briefly describe project activities, activities that interact with the ES	Construction of a G+1 Office Building for the Ministry of livestock, Forestry and Range (MOLFR), Galmudug State of Somalia . The building will serve as the Ministry's headquarters and is located Dhusamareb City
Categorize Project Activities into List A or List B or List C (see above)	Category C

Potential Environmental/Social Risks Impacts of Activities					
Risk Category (Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	I don't know	If these risks ('yes') are present, refer to:	Comments
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is an Environmental and/or Social Assessment required where project is undertaken?	Yes			ESMF	
Is there a risk of diversion of project benefits?		No		Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM)	
Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity?		No		Security Management Plan (SMP)	
Is there a risk that project benefits may not reach truly vulnerable populations?		No		Floods Impact Needs Assessment (FINA) Stakeholder Engagement Plan (SEP)	
Is there a risk that the activity will cause population influx from neighboring areas?		No		Floods Impact Needs Assessment (FINA) Stakeholder Engagement Plan (SEP)	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?		No		Security Management Plan (SMP) Grievance Mechanisms (GM)	
ESS 2: Labour and Working Conditions					

Does the activity include any of the known labor rights / ESS 2 non-compliance risks in Somalia (child and forced labor)?	Yes			Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include a construction component?	Yes			Labor Management Procedures (LMP) C-ESMP Occupational Health and Safety Plan (OHS)	
Does the activity include labor-intensive manufacturing?		No		Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include primary agricultural activities?		No		Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Will the activity require a larger contractor workforce?	Yes			Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for Project Workers?		No		Security Management Plan (SMP)	
Is there a risk of lacking OHS for workers at the construction site?	Yes			Occupational Health and Safety Plan (OHS) Pest Management Plan (PMP)	

Is there a risk of delayed payment of workers?		No		Labor Management Procedures (LMP)	In Somalia, both skilled and unskilled laborers are typically hired as casual workers and are paid on a daily basis. As a result, there is generally no risk of delayed payments.
Is there a risk that workers are underpaid?		No		Labor Management Procedures (LMP)	
Is there a risk that women will not be included in deployment in equal numbers?	Yes			Labor Management Procedures (LMP) GBV Action Plan	Since this is construction work, which is physically demanding, it is traditionally considered a male-dominated activity in Somalia. Culturally, women are not commonly involved in heavy labor but may participate in lighter tasks such as watering, preparing food, and other supportive roles.
ESS 3: Resource Efficiency and Pollution Prevention Management					
Will the activity result in the production of solid waste? (directly by the project or by workforce)	Yes			Waste Management Plan, based on WBG	
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceuticals, industrial chemicals, ozone depleting substances)	Yes			Environmental, Health, and Safety General Guidelines Pest Management Plan (PMP) C-ESMP	

Will the activity result in the generation of dust an noise?	Yes			C-ESMP	
Will the activity result in soil erosion?		No		C-ESMP	
Will the activity produce effluents (waste water)?		No		C-ESMP Waste Management Plan	
Will the activity result in increased levels of vibration from construction machinery?	Yes			C-ESMP	
Will the project produce air pollution? (e.g. significant greenhouse gas emissions, dust emissions and other sources)	Yes			C-ESMP	
Will the activity disturb any fauna and flora?		No		C-ESMP	
Will the activity result in irrigation water with high TDS with more than 1,500 ppm?		No		C-ESMP Waste Management Plan	
Can the project affect the surface or groundwater in quantity or quality? (e.g. discharges, leaking, leaching, boreholes, etc.)		No			
Will the project require use of chemicals? (e.g. fertilizers, pesticides, paints, etc.)		No			
Is there any risk of accidental spill or leakage of material?		No			
ESS 4: Community Health and Safety					
Is there a risk of community exposure to pesticides?		No		Pest Management Plan (PMP)	
Is there a risk of communal drinking water pollution through pesticides?		No		Pest Management Plan (PMP)	

Is there a risk of increased GBV/SEAH cases due to labor influx?		No		GBV/SEAH Action Plan Labor Management Procedures (LMP)	
Is there a risk of spread of communal diseases due to labor influx?	Yes			Labor Management Procedures (LMP) C-ESMP	
Is there a security risk to the community triggered by project activities?		No		Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GM)	
Will the activity include payments or cash transfers?	Yes			Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM)	
Will the activity expose community members to physical hazards on the project site?		No		C-ESMP	
Will the activity pose traffic and road safety hazards?		No		C-ESMP	
Will the activity include debris removal that may pose a safety hazard for the community?	Yes			Waste Management Plan	
Is there a possibility that the activity contaminates open wells?		No		Waste Management Plan C-ESMP	
Is there a possibility that the activity spreads pathogens and other pollutants (eg latrines)	Yes			Waste Management Plan C-ESMP	

Can the activity contribute to the spread of disease (eg health facilities)?	Yes			Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	The land is owned by FGS
Will the displacement / resettlement affect IDPs?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?		No		Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM)	Project is in the City of Mogadishu
Would the project potentially discriminate against women and girls based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GM)	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to disputes over land ownership?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	

Will the activity lead to blocked access to people in the area?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity require acquisition of land or physical buildings or infrastructure?	Yes			Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	This is public land belongs the Ministry of Livestock, Forestry and Range
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Are pesticides used in the activity likely to affect important natural resources or ecological functions?		No		Pest Management Plan (PMP)	
Will the activity impact sensitive areas?		No			
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?		No			
Is there a risk that the activity causes loss of precious ecological assets?		No			
ESS 10: Stakeholder Engagement and Information Disclosure					
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?		No		Stakeholder Engagement Plan (SEP)	
Is there a historical exclusion of disabled persons in the area?		No		Stakeholder Engagement Plan (SEP)	

Is there a lack of social baseline data?		No		ESMF	
Is there a lack of community consultations by the government generally?		No		Stakeholder Engagement Plan (SEP)	
Are women likely to participate in decision-making processes in regards to the activity?	Yes			Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?		No		Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM) – see ESMF	
Is there a risk that the activity will have poor access to beneficiaries?		No		Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM) – see ESMF	

SUMMARY OF THE SCREENING PROCESS

E&S Screening	Results and Recommendation		
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Individual Risk/ Impact Rating	Mitigation At the end of the screen process, tabulate the mitigation measures in an ESMP Format (see below)
	ESS 1: Need for a structured E&S assessment and management process.	Moderate	Develop and implement a project-specific ESMP.
	ESS 2: Labor rights non-compliance (child/forced labor), poor working	Moderate	Implement Labor Management Procedures (LMP) and a robust Occupational Health and Safety (OHS) Plan.

	conditions, and OHS hazards.		
	ESS 3: Pollution from solid/hazardous waste, dust, noise, and air emissions from construction activities.	Moderate	Implement a Waste Management Plan and site-specific controls within a Construction ESMP (C-ESMP).
	ESS 4: Spread of communicable diseases due to temporary labor influx.	Moderate	Implement worker health and hygiene protocols within the LMP and C-ESMP; manage waste and debris according to a Waste Management Plan.
	ESS 10: Need for active inclusion of women in decision-making.	Moderate	Implement targeted consultation and participation strategies as outlined in the Stakeholder Engagement Plan (SEP).
Is Additional Assessment Necessary? Evaluate the Risks/Impacts and reflect on options (see below)	Screening Result		Summary of Screening Result Justification
	2. Yes 1. Detailed ESMP. Done internally.		The project is correctly categorized as Category C (Moderate Risk). The screening identified multiple, predictable E&S risks across several standards (ESS 1, 2, 3, 4, 10) that are typical for a medium-scale construction project. These impacts are site-specific, largely reversible, and can be managed effectively with standard mitigation measures. Therefore, a detailed ESMP is required. Since the project does not involve involuntary resettlement, significant biodiversity impacts, or impacts

		on cultural heritage, a full ESIA is not necessary. The NPCU can develop the ESMP internally, guided by the project's ESMF.
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