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EE SOOMAALIYA**



**PUNTLAND STATE
OF SOMALIA**

Ministry of Agriculture and Irrigation

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**Somalia Food Systems
Resilience Project “P177816**



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Activity Title:

Rangeland Rehabilitation Rako District, Puntland

For:

Food Systems Resilience Project (FSRP) – Puntland Component

Date: July 2026

Project Coordinates:

9°45'03.9"N 49°43'17.5"E

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LIST OF ABBREVIATIONS

Abbreviation	Meaning
CBD	Convention on Biological Diversity
CoC	Code of Conduct
Deyr	October–December rainy season
E&S	Environmental and Social
EHS	Environmental, Health, and Safety
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FGS	Federal Government of Somalia
FSRP	Food Systems Resilience Project
GBV	Gender-Based Violence
GM	Grievance Mechanism
Gu	April–June rainy season
IDP	Internally Displaced Person
ILO	International Labour Organization
MoAI	Ministry of Agriculture and Irrigation
MoERCC	Ministry of Environment, Range, and Climate Change
OHS	Occupational Health and Safety
PCU	Project Coordination Unit
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
UNCCD	United Nations Convention to Combat Desertification
UNFCCC	United Nations Framework Convention on Climate Change
VLD	Voluntary Land Donation

1. Executive Summary

The Environmental and Social Management Plan (ESMP) for the Rangeland Rehabilitation Project in Rako has been prepared under the Somalia Food Systems Resilience Project (FSRP), financed by the World Bank and implemented by the Federal Government of Somalia and Puntland State. The project aims to restore degraded rangeland, control soil erosion, and strengthen the resilience of pastoral livelihoods in a community significantly affected by severe gully erosion, land degradation, and recurrent drought conditions. This ESMP has been developed in full alignment with the FSRP Environmental and Social Management Framework (ESMF), ensuring consistency with project safeguards procedures, screening requirements, and mitigation standards.

The project involves the implementation of soil and water conservation and land restoration measures within communal rangeland areas, specifically at the Kodmo gully site, which is affected by active and expanding gully erosion. The intervention includes construction of rock check dams, along with biological measures such as reseedling with native grasses, Farmer Managed Natural Regeneration (FMNR), and application of organic manure to stabilize soil, reduce runoff, and promote vegetation regeneration. The project is expected to significantly improve rangeland condition, enhance grazing capacity, and strengthen livestock-based livelihoods.

A critical objective of the intervention is to control gully expansion that is currently threatening the Rako borehole and water supply infrastructure, which serves as a vital resource for the community in an extremely arid environment.

The ESMP identifies the environmental and social risks associated with the project as moderate, site-specific, and manageable. Key risks during implementation include localized soil disturbance, dust emissions, occupational health and safety (OHS) risks related to manual works, community health and safety concerns, temporary access limitations, and labor-related risks. These risks are manageable through the mitigation and monitoring measures defined in the ESMP, which are aligned with the World Bank Environmental and Social Standards (ESS1–ESS10), the FSRP ESMF, and Puntland’s EIA Act (2023).

Key risks are expected to include (i) occupational health and safety risks during implementation activities, particularly manual handling of materials, (ii) community safety risks related to movement of workers and materials, and (iii) temporary access disruptions within communal land areas. These risks will be managed through appropriate OHS measures (PPE, toolbox talks, safe

work practices), community safety measures (signage, controlled access, awareness), and coordination with local stakeholders to maintain access and minimize disruption.

Stakeholder consultations involving local authorities, community elders, pastoralists, women, youth groups, and rangeland committees confirmed strong support for the project. Stakeholders emphasized the urgent need to address gully erosion, particularly due to its direct threat to grazing land and the Rako borehole, as well as the importance of timely implementation to prevent further expansion of erosion. A functional Grievance Mechanism (GM), including Hotline 3060, has been established, and focal points were identified to ensure transparent and timely resolution of complaints.

Effective ESMP implementation will require coordinated actions from the Project Coordination Unit (PCU), MoERCC as the lead technical owner, the contractor, supervising engineer, and Rako District Administration. The total ESMP implementation cost is estimated at USD 5,000, covering mitigation measures, monitoring, site safety, and community engagement activities during the implementation phase.

Overall, the ESMP concludes that the Rako rangeland rehabilitation intervention can be implemented safely, sustainably, and in full compliance with national regulations, the FSRP ESMF, and World Bank Environmental and Social Standards. With proper implementation, the project will deliver significant benefits, including restoration of degraded rangeland, protection of critical water infrastructure, improved grazing capacity, and strengthened resilience of pastoral communities.

2. Introduction

2.1 Project Overview

The Somalia Food Systems Resilience Project (FSRP) is a World Bank–funded project jointly implemented by the Federal Government of Somalia (FGS) and Federal Member States, including Puntland State of Somalia. The project seeks to strengthen the resilience of Somalia’s food systems to climate shocks through climate-smart investments in agriculture, livestock, water management, and market infrastructure.

FSRP supports national and sub-national efforts to improve agricultural productivity, market access, and sustainable management of natural resources while addressing vulnerabilities caused by drought, land degradation, and weak value chains. The project aligns with Somalia’s long-term vision of achieving food security and economic stability through sustainable and inclusive development.

The project’s design draws from lessons learned in previous resilience and drought recovery programs in the Horn of Africa and aims to promote climate-resilient production systems, improved market integration, and institutional coordination between key sectors.

In Puntland, under the component supporting rangeland and natural resource management, the project is implementing Rangeland Rehabilitation in Rako, Puntland State of Somalia. The intervention aims to restore degraded rangeland areas affected by severe gully erosion, recurrent drought, overgrazing, and expanding desertification trends.

Rako is a long-established pastoral settlement where livelihoods depend primarily on camels, goats, and sheep, complemented by frankincense production and small businesses. The community relies heavily on surrounding rangelands for grazing, with both settled and mobile pastoralists utilizing the wider rangeland system.

In recent years, Rako has experienced significant environmental degradation, particularly widespread gully erosion across multiple locations. These gullies have deepened and expanded due to intense runoff during rainfall events, weak soil structure, and reduced vegetation cover, resulting in loss of grazing land, disruption of livestock movement routes, and increased safety risks.

The subproject focuses on rehabilitation of degraded land at selected sites, particularly the Kodmo gully system, which has been identified as the priority intervention site due to its proximity (approximately 280 meters) to the Rako borehole and water supply infrastructure. The advancing gully poses a direct threat to this critical water source, making immediate intervention essential.

The proposed intervention includes construction of rock check dams strategically placed along the gully channel to intercept runoff, reduce flow velocity, and trap sediments. These measures will be complemented by biological interventions such as reseedling of native grasses and application of organic manure to enhance soil stability and promote vegetation recovery.

The intervention will support reduction of erosion risk, protection of critical water infrastructure, improved grazing conditions, and enhanced resilience of pastoral livelihoods.

The rehabilitation activities will be implemented on existing open rangeland in Rako, with no individual ownership claims, land acquisition, or voluntary land donation involved. The community was formally consulted and expressed strong support for the intervention. The intervention is expected to improve soil stability, restore vegetation cover, and contribute to sustainable rangeland management and climate resilience in the project area

2.2 Purpose of the Environmental and Social Management Plan (ESMP)

The purpose of this Environmental and Social Management Plan (ESMP) is to identify, evaluate, and manage the environmental and social risks associated with the implementation of the Rangeland Rehabilitation activities in Rako. The ESMP ensures compliance with the World Bank Environmental and Social Framework (ESF) particularly the Environmental and Social Standards (ESS1–ESS10) and with Puntland State environmental legislation, including the Environmental Impact Assessment Act (2023).

This ESMP serves as a guiding instrument for implementing entities, contractors, supervisory personnel, and relevant government agencies to:

- Minimize adverse environmental and social impacts during implementation of rangeland rehabilitation activities, including soil and water conservation works and vegetation restoration measures
- Promote safe, healthy, and inclusive working conditions
- Ensure systematic monitoring and reporting of environmental and social performance
- Establish clear institutional responsibilities for ESMP implementation
- Enhance community engagement and provide accessible grievance mechanisms
- Protect critical infrastructure, particularly the Rako borehole and water supply system, from advancing gully erosion risks

2.3 Scope of the ESMP

This ESMP applies to all phases of Rangeland Rehabilitation activities in Rako including:

- Site preparation and minor land clearance required for implementation of soil and water conservation measures
- Implementation of soil and water conservation structures such as rock check dams and gully control structures along the Kodmo gully system and associated runoff pathways
- Management of environmental risks such as dust, noise, waste, vegetation disturbance, and drainage during implementation phase
- Occupational health and safety measures for workers and community members
- Biological restoration measures including Farmer Managed Natural Regeneration (FMNR), reseeding of native grasses, and application of organic manure to support vegetation recovery
- Measures to protect critical infrastructure and community assets, particularly reducing erosion risks threatening the Rako borehole and water supply infrastructure, as well as grazing land and livestock movement routes
- Stakeholder engagement, consultations, and GM mechanisms
- Monitoring, compliance, and institutional arrangements for long-term sustainability of the rehabilitated rangeland.

The ESMP is informed by field observations, technical assessments, community consultations, and environmental and social screening findings.

2.4 Methodology

The preparation of this ESMP followed a structured methodology aligned with the S-FSRP Environmental and Social Management Framework (ESMF), the World Bank ESF, and the Puntland EIA Act (2023). The following approaches were used:

a. Field Observations and Site Assessments

A technical team conducted site visits to assess gully erosion across multiple sites, watershed characteristics, drainage patterns, vegetation cover, land use, and accessibility of intervention areas in Rako Village. Nearby sensitive receptors such as grazing areas, livestock movement routes, community settlements, and critical infrastructure (including the Rako borehole and water supply system) were also identified. GPS coordinates, photos, and measurements of the selected sites, particularly the Kodmo gully system, were recorded.

b. Desktop Review

A review of relevant documents, including:

- Project design and layout

- Rangeland Rehabilitation Project Description document World Bank ESS1–ESS10
- Puntland environmental and labor legislation
- Desktop review also included land use arrangements, confirming that the project area is communal rangeland with no private ownership, land acquisition, or VLD requirements.

c. Environmental & Social Screening

The S-FSRP screening checklist was applied to determine risk levels, ESS applicability, and required mitigation measures. The project was classified as **Moderate Risk**, considering potential impacts on soil disturbance, vegetation loss during implementation, OHS, and community access to grazing areas.

d. Stakeholder Consultations

Meetings with Rako community leaders, local authorities, pastoralists, women’s groups, and elders were conducted to::

- Identify priority degraded sites and rehabilitation needs
- Discuss environmental and social risks particularly gully erosion, land degradation, and threats to grazing land and the Rako borehole
- Share information on the Grievance Mechanism (GM), including FSRP Hotline 3060

2.5 Project Activity Description

The proposed Rangeland Rehabilitation in Rako aims to restore degraded rangeland and agricultural areas, control soil erosion, and improve land productivity and resilience for pastoral livelihoods and grazing systems. The intervention is designed to implement soil and water conservation measures and vegetation restoration in a sustainable and climate-resilient manner.

Key project components include:

- **Soil and Water Conservation Structures:**

Construction of rock check dams strategically placed along the Kodmo gully system to intercept runoff, reduce flow velocity, control gully expansion, and enhance water infiltration.

- **Bio-engineering Measures:**

Application of animal manure and reseedling with approved native grass species, combined with FMNR along intervention areas to promote vegetation regeneration, improve soil fertility, and stabilize the land.

- **Erosion Control and Land Stabilization:**

Implementation of integrated watershed-based measures to stabilize active erosion areas, prevent expansion of gullies, and protect grazing lands, livestock movement routes, and critical infrastructure such as the Rako borehole and water supply system.

- **Land Development and Restoration:**

Minor land shaping and rehabilitation of degraded areas to support vegetation recovery, improve soil structure, and enhance long-term productivity of rangeland and farmland.

Rangeland Rehabilitation – Workforce Composition

The implementation of the Rangeland Rehabilitation activities in Rako will engage an estimated 30 workers during peak periods. The workforce composition is as follows

- **Total workers:** 30
- **Skilled workers:** 6
- **Unskilled workers:** 22
- **Engineers and site management team:** 2

In terms of origin:

- **Local community workers:** 28 (mainly unskilled and semi-skilled labor)
- **Workers from outside the project area:** 2 (engineers and site management staff only)

The project will prioritize recruitment from the local community, particularly for unskilled and semi-skilled positions, to minimize labor influx and associated social risks, including GBV/SEA/SH, in line with ESS2 and ESS10.

3. Policy, Legal, and Administrative Framework

3.1 Introduction

This section outlines the national policies, legal instruments, institutional mandates, and international frameworks relevant to the environmental and social management of the Rangeland Rehabilitation activities in Rako. The project must comply with Puntland State regulations, Federal Government policies, and the World Bank Environmental and Social Framework (ESF). The objective is to ensure that all project activities are implemented in an environmentally responsible, socially inclusive, and legally compliant manner.

3.2 National Legal and Regulatory Framework

a. Puntland Environmental Management Law, 2023

This law provides a comprehensive framework for:

- Conservation of natural resources;
- Pollution prevention;
- Waste management practices;
- Protection of soil, vegetation, and water resources;
- Enforcement of environmental standards.

The law is particularly relevant for soil conservation, gully erosion control, vegetation restoration, and sustainable rangeland management activities in Rako.

b. Puntland Labour Law, 2004

This law sets minimum requirements for:

- Safe and healthy working conditions;
- Worker rights and responsibilities;
- Prohibition of forced and child labor;
- Provision of appropriate PPE and medical care for workers.

It aligns closely with World Bank ESS2 (Labor and Working Conditions) and informs the contractors on Labor Management Procedures (LMP) to all project workers including

prohibition of child and forced labor, non-discrimination, OHS provisions, worker's rights and a dedicated Worker's GM separate from the community GM.

c. Puntland Water Resources Act, 2003

This Act regulates:

- Sustainable use of piped and groundwater resources;
- Protection of water infrastructure;
- Prevention of contamination from waste disposal.

The project supports this Act by reducing gully erosion risks and protecting the Rako borehole and water supply infrastructure from potential damage caused by advancing erosion and runoff.

d. Puntland Public Health Law, 2007

This law supports:

- Prevention of disease transmission
- Protection of community health and safety
- Environmental sanitation practices.

The project contributes to this law through improved environmental conditions, reduced erosion risks near community areas, and safer grazing environments for livestock and people.

e. Puntland Disaster Risk Management Policy, 2024

This policy emphasizes:

- Integration of climate resilience and disaster preparedness into development projects;
- Community-based early warning systems;
- Strengthening of institutional capacity for hazard mitigation.

The project supports these objectives by reducing gully erosion, controlling runoff, and protecting critical infrastructure from erosion risks.

3.4 World Bank Environmental and Social Framework (ESF)

The ESF comprises ten Environmental and Social Standards (ESSs). The following ESSs are applicable to the Rangeland Rehabilitation Project in Rako District

Table 1: WB ESSs

ESS	Title	Relevance to the Project
ESS1	Assessment and Management of Environmental and Social Risks and Impacts	Provides the overarching framework for ESMP preparation.
ESS2	Labor and Working Conditions	Applies to all workers; governs OHS, fair treatment, and labor rights.
ESS3	Resource Efficiency and Pollution Prevention	Relevant for waste management, energy use, drainage, and soil protection.
ESS4	Community Health and Safety	Applies to manage community and livestock safety risks from open work areas, dust, noise, and worker-community interaction during implementation.
ESS5	Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	Not triggered. The project is implemented on open rangeland land with no formal or customary ownership. As no land acquisition, voluntary land donation, or involuntary resettlement is involved, ESS5 does not apply
ESS10	Stakeholder Engagement and Information Disclosure	Mandatory consultations and GM integration throughout the project.

3.5 International Conventions and Agreements

Somalia is a party to several environmental and labor conventions relevant to the project:

- **Convention on Biological Diversity (CBD)** – sustainable management of natural resources
- **United Nations Framework Convention on Climate Change (UNFCCC)** – adaptation and low-carbon development
- **United Nations Convention to Combat Desertification (UNCCD)** – soil and rangeland protection
- **Basel Convention** – controls on hazardous waste disposal
- **ILO Conventions** – protection of worker rights and occupational safety

The project supports Somalia's commitments under these instruments by implementing soil and water conservation measures, restoring degraded rangelands, reducing gully erosion, protecting critical water infrastructure, and promoting safe labor practices in Rako Village.

4. Project Area Description

4.1 General Location

The proposed Rangeland Rehabilitation intervention will be implemented in Rako), Karkaar Region, Puntland State of Somalia. Rako is a predominantly pastoral community, where livestock production (camels, goats, and sheep) and frankincense harvesting form the backbone of household livelihoods. The community relies heavily on surrounding rangelands for grazing and livelihood support, with both settled and mobile pastoral systems in place.

The project site is located within communal rangeland, specifically at the Kodmo gully system, which is affected by severe gully erosion, high surface runoff, and land degradation driven by weak soil structure and extremely low rainfall conditions. The site is part of a larger watershed system (189 km²) where runoff concentrates and accelerates erosion processes.

The selected intervention area is located approximately 3 km from Rako village and about 280 meters downstream of the Rako borehole and water supply infrastructure, making it a critical location for intervention to prevent further erosion and protect essential water resources.

The intervention area is accessible through existing community tracks and livestock movement routes, allowing movement of workers and materials.

GPS coordinates recorded during the field assessment are: **9°45'03.9"N 49°43'17.5"E**.



Figure 1: Rako site map

4.2 Land Ownership and Tenure

The land designated for the rangeland rehabilitation activities is open rangeland in the Rako , with no individual or collective ownership, used freely for grazing under customary systems. The project does not involve land acquisition or voluntary land donation (VLD), and ESS5 is therefore not triggered. Community acknowledgement of the intervention was formally documented through signed consultation minutes, attendance sheets, and deliberation records, available in Annex 10.2

The community confirmed that:

- The land is open rangeland free of individual ownership claims or disputes
- No physical or economic displacement will occur;
- The intervention will not result in permanent restriction of access to grazing or agricultural areas;
- The rehabilitation activities are supported by the community as a priority for restoring degraded rangeland and protecting critical water infrastructure (Rako borehole), and improving livestock-based livelihoods.

As the project area is open rangeland with no formal ownership or registration, no VLD documentation is required. All activities will be implemented in full consistency with community acknowledgement and without adverse impacts on land use rights or livelihoods.

4.3 Accessibility and Infrastructure

Access Roads

The project site is located approximately 100 km from Qardho and is accessed via a gravel road, which is generally passable throughout the year under normal conditions. However, during periods of heavy rainfall, sections of the road may become temporarily inaccessible due to flooding, runoff, and erosion, which can disrupt movement of workers, materials, and equipment to the site.

Internal access to the intervention area near the Kodmo gully is through local tracks and livestock movement routes, which may also be affected during rainfall events due to localized erosion and surface runoff.

Water Supply

No formal piped water system is available at the immediate intervention site. However, the area is located approximately 280 meters downstream of the Rako borehole and water supply infrastructure, which is the primary water source for the community. The project does not require permanent water supply infrastructure but aims to protect this critical water source from advancing gully erosion and runoff impacts

Electricity

There is no formal electricity supply at the intervention site. The rehabilitation activities do not require electricity, as works are manual, nature-based, and rely on locally available materials.

Communication and Internet

Mobile network coverage in Rako Village is generally available, allowing basic communication during implementation activities. Internet access is limited but not required for site operations.

4.4 Social Conditions

- **Socio-economic Context:** Rako is a rural pastoral settlement where livelihoods and household welfare are closely linked to livestock production and the condition of surrounding rangeland resources. Recurrent droughts, land degradation, and erosion pose challenges to community resilience and productivity.
- **Livelihoods:** The primary livelihood activity is livestock rearing, including camels, goats, and sheep. Some households also engage in small-scale trade and other income-generating activities. Access to healthy grazing land and water resources is critical for sustaining local livelihoods.

- **Women and Youth:** Women contribute to household livelihoods through livestock management, small-scale trade, and domestic activities, while youth are actively involved in livestock herding and other livelihood activities.
- **Access to Basic Services:** Access to education, healthcare, water supply, and communication services is available but limited compared to urban areas. Community members primarily rely on local facilities and services located within Rako and nearby settlements.
- **Gender-Based Violence (GBV):** No significant GBV concerns were identified during stakeholder consultations. However, the project will implement awareness measures, a Workers' Code of Conduct, and a Grievance Mechanism (GM) in line with World Bank requirements.
- **Cultural Heritage:** No known cultural heritage sites, archaeological resources, or areas of cultural significance were identified within the project area. A Chance Finds Procedure will be included in the Contractor's ESMP.
- **Security:** The security situation in the area is generally stable. Project activities will be coordinated with local authorities and community leaders to ensure safe implementation.
- **Community Health and Safety:** The project is expected to improve environmental conditions by reducing erosion and restoring degraded rangeland. Potential community health and safety risks during implementation will be managed through site safety measures, awareness raising, and controlled access to active work areas.
- **Grievance Mechanism:** The S-FSRP Grievance Mechanism (GM) is available to all stakeholders to raise concerns or complaints related to project activities. Information on the GM, including Hotline 3060, has been shared with community members during consultations.

4.5 Physical and Biophysical Environment

Topography and Soil

The terrain is gently sloping within a medium-sized watershed system (189 km²) in Rako, with soils that are weakly structured, erosion-prone, and susceptible to gully formation. Active gully erosion is observed at the Kodmo site, with deep incision, head-cut advancement, and widening channels driven by concentrated runoff during rainfall events.

Vegetation

Vegetation cover is moderate, dominated by shrubs and seasonal grasses. However, increasing bare patches and reduced regeneration capacity are observed due to overgrazing, recurrent drought, and ongoing soil erosion. Some areas still show natural regeneration potential, indicating

that restoration measures can be effective. No protected, rare, or endangered plant species were identified.

Climate

Rako experiences an arid to semi-arid climate, characterized by

- Low annual rainfall
- Short, high-intensity rainfall events followed by long dry periods
- High temperatures throughout the year
- High variability in rainfall contributing to rapid runoff and erosion

These climatic conditions underscore the importance of soil and water conservation and vegetation restoration measures.

Hydrology and Drainage

The project area lies within a larger watershed system, where runoff is generated from extensive upstream areas and concentrated along defined drainage channels. Due to low vegetation cover and poor soil structure, rainfall rapidly converts into surface runoff, leading to severe gully formation and expansion, particularly at the Kodmo site.

The watershed's size and hydrological characteristics contribute to high runoff volumes and erosive energy, which significantly increase the risk of further gully expansion toward the Rako borehole and surrounding grazing areas.

Wildlife

The area is primarily rangeland used for livestock grazing, with no wildlife migratory routes or significant natural habitats identified near the project site.

5. Evaluation of Environmental and Social Impacts

5.1 Introduction

This section evaluates the potential environmental and social impacts associated with the implementation of the Rangeland Rehabilitation activities in Rako during the implementation phase. The assessment considers the project's physical setting, socio-economic context, activities involved, and sensitivities identified during field observations and community consultations.

The impacts are categorized as positive or negative, direct or indirect, short-term or long-term, and are rated based on significance and the extent to which they can be avoided, minimized, or mitigated through appropriate measures.

Overall, the project is classified as Moderate Risk, with impacts that are predictable, site-specific, and manageable through the mitigation measures outlined in the ESMP.

5.2 Positive Impacts

The implementation of rangeland rehabilitation activities will generate significant environmental, social, and economic benefits, including:

a. Restoration of Degraded Land

- Reduction of gully erosion and stabilization of active erosion channels
- Improved soil stability and structure
- Enhanced land productivity in affected areas

b. Improved Rangeland and Agricultural Productivity

- Increased availability of pasture for livestock
- Improved condition of grazing land and livestock movement routes

- Improved soil moisture retention and vegetation growth

c. Strengthened Community Resilience

- Reduced vulnerability to drought and land degradation impacts
- Improved watershed function and runoff control
- Enhanced long-term sustainability of land resources

d. Protection of Critical Infrastructure

- Reduced risk of gully expansion threatening the Rako borehole and water supply system
- Improved long-term security of water resources in an extremely arid environment

e. Economic Benefits for Households

- Improved livestock productivity and grazing capacity
- Increased livestock productivity and household income
- Reduced losses due to land degradation

f. Employment Opportunities

- Short-term employment for local community members during implementation works

g. Capacity Building and Knowledge Transfer

- Increased community awareness on soil and water conservation practices
- Strengthening of local knowledge on sustainable rangeland management

h. Environmental Benefits

- Vegetation regeneration through reseeding, FMNR and natural recovery
- Improved biodiversity at local level (grasses and shrubs)
- Reduced sediment transport and downstream impacts

5.3 Negative Environmental and Social Impacts, Risk Assessment and Mitigation Measures

Although the project's overall impacts are positive, certain construction and operational activities may generate adverse effects if not properly managed. The table below combines the identification of negative impacts, their causes, risk ratings (inherent and residual), and the mitigation measures to be applied. Inherent risk is rated before mitigation; residual risk reflects the expected rating after mitigation is fully implemented. All residual risks are reduced to Low.

Table 2: Negative Environmental and Social Impacts, Risk Assessment and Mitigation Measures in Rako

Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Mitigation Measures	Residual Risk
Soil Disturbance	Installation of rock dams and gabions may cause localized soil disturbance.	Excavation and placement of rock dams, gabions and bunds disturb surface soils.	Implementation	ESS1	Soils, vegetation, downstream drainage	Medium	Minimize excavation footprint; immediately stabilize disturbed areas; place structures on stable foundations; inspect after rain events.	Low
Protection of Critical Infrastructure (Rako Borehole)	Risk of gully expansion threatening the Rako borehole and water supply system.	Active gully channels advancing toward the borehole area without erosion control.	Implementation	ESS1; ESS4	Rako borehole, community water supply	Medium	Prioritize installation of check dams and gabions upstream of the borehole; maintain a 20m buffer zone free of excavation around borehole infrastructure; inspect borehole area after every significant rainfall event.	Low
Dust Emissions	Dust generated from movement of materials and site activities may affect nearby areas.	Movement of stone materials and dry-season earthworks generate fugitive dust.	Implementation	ESS3; ESS4	Workers, nearby community, livestock	Medium	Apply water spraying to active work areas; limit vehicle speed to 20 km/h; schedule heavy works outside peak wind hours.	Low
Noise (Minor)	Minor noise from manual works and limited equipment use.	Manual stone-breaking and limited equipment generate intermittent noise.	Implementation	ESS4	Nearby residents, livestock	Low	Restrict works to daytime hours (08:00-17:00); provide advance notice to community; avoid simultaneous multi-point operations.	Low

Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Mitigation Measures	Residual Risk
Labour Disputes (Payment, Overtime, Working Conditions)	Disputes related to payment, overtime, and working conditions may disrupt works.	Delays in payment, unclear contracts, or poor conditions may cause worker grievances.	Implementation	ESS2	Project workers	Medium	Issue written contracts to all workers; pay wages on schedule; maintain worker GM separate from community GM; post Hotline 3060 at site.	Low
Occupational Health & Safety (OHS) Risks	Risks from manual handling of stones, tools, heat exposure, and fatigue.	Manual stone-carrying and heat exposure in an extremely arid environment.	Implementation	ESS2	Workers	Medium	Provide PPE (gloves, boots, hats); supply adequate drinking water; enforce 30-minute rest every 2 hours during peak heat; maintain first-aid kit on site.	Low
Community Health & Safety Risks	Risks from open work areas, movement of materials, and interaction with community and livestock.	Open work areas and material stockpiles expose community members and livestock to injury.	Implementation	ESS4	Community members, livestock	Medium	Erect warning barriers; install signage; inform community before works commence; avoid works during peak livestock movement times.	Low
Potential SEA/SH Risks	Low risk associated with worker-community interaction if not properly managed.	Worker presence in remote community areas without adequate Code of Conduct enforcement.	Implementation	ESS2; ESS10	Community members, especially women and girls	Low	Enforce signed Code of Conduct for all workers; conduct SEA/SH awareness training; ensure confidential survivor-centred GM pathway is accessible.	Low
Temporary Access Restrictions	Temporary limitation of access to grazing or farming areas	Construction works may temporarily block grazing	Implementation / Post-Rehabilitation	ESS5	Pastoralists, farmers	Medium	Agree access restriction schedule with community prior to works; maintain	Low

Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Mitigation Measures	Residual Risk
	during implementation or recovery period.	routes or farming areas.					alternative access routes; define and communicate recovery period (3 months no-grazing for Rako).	
Community Grazing Pressure on Rehabilitated Land	Premature return of livestock before vegetation establishment destroys rehabilitation investment.	Absence of grazing control allows livestock to destroy newly established vegetation.	Post-Implementation	ESS1	Rehabilitated rangeland, project investment	Medium	Community committee and local elders to enforce community-agreed no-grazing period of 3 months through traditional rangeland governance; Community Committee to monitor and report violations. No external fencing required — community protection mechanisms apply.	Low
Biodiversity: Inappropriate Reseeding Species	Risk of replacing traditionally adapted plant species with non-native or invasive grass species.	Procurement of incorrect seed without MoERCC verification.	Implementation	ESS6	Native ecosystems, local biodiversity	Medium	Use only approved native Somali species previously tested and verified by MoERCC All seed from MoERCC-approved suppliers. Non-native or GM seeds strictly prohibited.	Low
Soil & Water Conservation Structures: Drainage Alteration	Incorrectly designed bunds or rock dams may alter natural drainage,	Inadequate engineering of check dams or bunds without	Implementation	ESS1; ESS3	Soils, downstream land users, Rako borehole area	Medium	Technical drawings prepared by qualified soil/water conservation engineer; structures reviewed	Low

Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Mitigation Measures	Residual Risk
	threatening the Rako borehole area.	qualified design review.					and approved before construction; post-rain inspection within 48 hours of first significant rainfall.	
Resource Use: Water Inefficiency	Seedling establishment may require supplemental water; inefficient use stresses scarce water resources including the Rako borehole.	Lack of water-harvesting structures forces reliance on supplemental water supply.	Implementation	ESS3	Community water supply, Rako borehole, seedling survival	Low	Plant all seedlings within water-harvesting structures (half-moons, micro-basins); schedule planting to coincide with Gu or Deyr rains; use portable water trucks only as supplemental measure.	Low
Pollution: Solid Waste	Seedling poly-bags, food waste, and packaging generate site waste.	Project activities produce non-organic and organic waste with no designated disposal plan.	Implementation	ESS3	Site environment, soil, community health	Low	Collect all waste in designated bins; segregate organic (compost on-site) from non-organic (plastics removed to nearest designated disposal facility); no burning of plastics on site; daily site clearance.	Low
Pollution: Fuel/Oil Spills	Fuel or oil from water pumps or vehicles may contaminate soil or nearby water sources including the Rako borehole.	Unsafe storage or handling of fuels near sensitive water infrastructure.	Implementation	ESS3	Soil, groundwater, Rako borehole and water supply	Low	Store fuel in bunded containment area minimum 50m from any water source including the Rako borehole; maintain spill kit on-site; train operators on spill response; report all spills	Low

Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Mitigation Measures	Residual Risk
							immediately to Supervising Engineer.	
Climate Risk: Seedling Mortality during Dry Spells	Newly planted seedlings face high mortality risk during extended dry spells in the first years after planting.	Insufficient rainfall and lack of aftercare during dry seasons in an arid environment.	Post-Implementation	ESS1; ESS6	Rehabilitated vegetation, project outcomes	Medium	Select drought-tolerant native Somali species previously tested by MoERCC install water harvesting structures before rainy season; establish community-based aftercare plan with designated watering teams during dry periods.	Low
Climate Risk: Flash Flood Damage to Structures	Intense rainfall events may exceed the design capacity of rock dams or bunds, threatening the Rako borehole area.	Under-designed spillway capacity unable to pass peak storm flows.	Implementation / Post-Implementation	ESS1; ESS3	Soil conservation structures, Rako borehole area	Medium	All structures to be engineered with appropriate spillway design; particular attention to structures near the Rako borehole; structures to be inspected within 48 hours of any rainfall event exceeding 25mm.	Low
Climate Risk: Re-Degradation during Future Droughts	Extended droughts may kill established vegetation and reverse rehabilitation gains.	Insufficient vegetation density to withstand prolonged dry periods.	Post-Implementation	ESS1; ESS6	Rehabilitated rangeland, community livelihoods	Medium	Vegetation monitoring with photographic records twice yearly; rapid reseeding protocol to be activated if vegetation cover falls below 25% of established baseline.	Low

5.4 Grazing Management and Community Enclosure Plan

The most immediate environmental threat to rehabilitated rangeland is the premature return of livestock before vegetation has established. To protect the rehabilitation investment at Rako, the following mandatory grazing management measures shall be implemented:

- **Community Protection:** The community committee, in coordination with the Village Development Committee (VDC) and local elders, shall take full responsibility for protecting all rehabilitated and reseeded areas from premature livestock entry. protection shall be enforced through community-based monitoring, social agreements, and traditional rangeland governance mechanisms.
- **No-Grazing Period:** A strict community-agreed no-grazing period of 3 months shall be enforced for all rehabilitated areas at Rako, consistent with the vegetation establishment requirements under local arid-zone conditions.
- **Community Enforcement:** The community committee, in coordination with the VDC and local elders, shall be responsible for monitoring compliance with the no-grazing restriction and reporting violations to the Supervising Engineer.
- **Graduated Return:** After the no-grazing period, livestock shall be reintroduced gradually, beginning with low-stocking-rate grazing for a further 3 months, before full communal grazing is resumed.
- **Signage:** Visible signs (in Somali language) marking no-grazing zones and the expected end-date of the restriction shall be posted at all entry points to the rehabilitated area.

5.5 Resource Efficiency, Pollution Prevention and Climate Resilience

5.5.1 Resource Efficiency

- **Water Efficiency:** All seedlings shall be planted within water-harvesting micro-structures (half-moons, bunds, or micro-basins) to maximise capture of natural rainfall and reduce the need for supplemental irrigation. Works near the Rako borehole and water supply infrastructure shall be planned to ensure zero risk of contamination or disruption. Supplemental watering using portable water trucks shall be used only during the first dry spell immediately following planting.
- **Local Materials:** Stone and aggregate for rock dams and gabions shall be sourced locally from within or near the project area to minimise transport distances, reduce emissions, and support the local economy. Transport distances shall be documented in monthly progress reports.
- **Technical Specifications:** All physical soil and water conservation structures (semi-circular bunds, rock check dams, trapezoidal bunds) shall be constructed in accordance with technical drawings prepared by a qualified soil and water conservation engineer. Designs shall be reviewed and approved by MoERCC before construction commences.

5.5.2 Pollution Prevention

Solid Waste Management Plan:

- All project-generated waste (seedling poly-bags, food waste, packaging, stone off-cuts) shall be collected in designated waste receptacles at each work site.
- Waste shall be segregated at source: organic waste (food, plant material) to be composted on-site or buried in a designated pit; non-organic waste (plastics, packaging) to be collected and transported to the nearest designated municipal waste facility.
- No waste shall be burned on-site. No waste shall be left scattered in the work area. Site shall be cleared of all waste at the end of each working day.
- The Contractor shall maintain a simple waste log recording volumes and disposal methods, to be reviewed by the Supervising Engineer weekly.

Fuel and Hazardous Materials Spill Contingency Plan:

- **Storage:** All fuels and lubricants shall be stored in a bunded containment area (capable of holding 110% of the largest container) located a minimum of 50 metres from any surface water source, including the Rako borehole and water supply infrastructure.
- **Spill Kit:** A spill response kit (comprising absorbent pads, dry sand, a shovel, and waste bags) shall be maintained on-site at all times during the use of any motorised equipment.
- **Operator Training:** All equipment operators and the site EHS focal person shall be trained in spill response procedures before commencing works involving fuels.
- **Reporting:** Any spill, however small, shall be reported immediately to the Supervising Engineer. Contaminated soil shall be excavated, stored in sealed containers, and disposed of at a facility approved by MoERCC.

5.5.3 Climate Resilience and Vulnerability Assessment

The Rako rangeland rehabilitation activities take place in an extremely arid, climate-stressed environment. The following climate risks to the rehabilitation activities themselves have been identified and corresponding adaptation measures incorporated:

- **Risk Seedling Mortality during Extended Dry Spells:** Newly planted seedlings face high mortality risk during dry seasons in the first 1-2 years after planting. Adaptation: Select drought-tolerant native Somali species previously tested and verified by MoERCC (*Cenchrus ciliaris*, *Acacia* spp.). Install water-harvesting structures before the Gu or Deyr rainy season to capture maximum rainfall. Establish a community-based aftercare plan designating community members responsible for supplemental watering during dry periods.
- **Risk Flash Flood Damage to Structures:** Intense rainfall events may exceed the design capacity of rock dams or bunds, causing structural failure. Particular attention shall be paid to structures near the Rako borehole to ensure no flood water is redirected toward water infrastructure. Adaptation: All structures to be engineered with appropriate spillway

design to safely pass peak flows. Structures to be inspected within 48 hours of any rainfall event exceeding 25mm.

- **Risk of Re-Degradation during Future Droughts:** Extended droughts may kill established vegetation and reverse gains. Adaptation: Vegetation monitoring with photographic records twice yearly; rapid reseeding protocol to be activated if vegetation cover falls below 25% of established baseline.

6. Environmental and Social Management Plan (ESMP)

6.1 Overview of Key Environmental and Social Risks and Impacts

The implementation of the Rangeland Rehabilitation activities in Rako will generate a range of environmental and social risks requiring careful management. Key risks include localized soil disturbance from installation of erosion control structures, dust emissions, minor noise, manual handling risks, and community health and safety concerns. Additional risks identified through the Chapter 5 assessment include biodiversity impacts from invasive species and inappropriate reseeding, drainage alteration from structures, climate risks to seedling establishment, and community grazing pressure on rehabilitated land.

A site-specific risk at Rako is ongoing gully expansion toward the Rako borehole and water supply system, which requires prioritized intervention and dedicated monitoring.

No armed security personnel will be used on this project, which reduces ESS4 security risks. Site access control will be managed through community-based mechanisms only.

No hazardous materials are associated with the project. The intervention is based on nature-based, low-impact soil and water conservation measures.

These risks are generally predictable, site-specific, and manageable through the standard mitigation measures outlined in this ESMP. Positive impacts include restoration of degraded land, improved soil stability, enhanced vegetation cover, and increased grazing productivity and

livestock-based livelihoods, strengthened household resilience, and short-term employment opportunities for local communities.

6.2 Objectives of the Environmental and Social Management Plan

The purpose of the ESMP is to:

- Ensure that environmental and social risks identified during screening, assessment are effectively mitigated, monitored, and managed throughout the project cycle.
- Provide clear roles, responsibilities, timelines, and resources for implementing all mitigation measures.
- Ensure compliance with national environmental regulations and the World Bank Environmental and Social Standards (ESS1-ESS10).
- Promote safe implementation practices and safeguard workers, nearby communities, and livelihood activities (farming and grazing).
- Strengthen environmental and social performance during implementation and the subsequent land management phase.

6.3 Waste and Pollution Management

The following waste and pollution management requirements apply to all works at Rako:

6.3.1 Solid Waste Management

- Waste types include: seedling poly-bags (plastic), food waste, packaging materials, and stone off-cuts. These are classified as non-hazardous municipal solid waste.
- All waste shall be collected in designated receptacles at each work site. Organic waste shall be composted on site or buried in a designated pit. Non-organic waste (plastics, packaging) shall be transported to the nearest approved municipal disposal facility in town.
- Open burning of waste is strictly prohibited. Dumping of waste in wadis, drainage channels, or rangeland areas is prohibited. The Contractor shall maintain a daily waste log reviewed weekly by the Supervising Engineer.

6.3.2 Fuel and Oil Management

- Fuel and lubricants shall be stored in a bunded containment area (capable of holding 110% of the largest container) located a minimum of 50 metres from any water source, including the Rako borehole. Refuelling shall occur only in the designated area. A spill kit (absorbent pads, dry sand, shovel) shall be maintained on site at all times. Any spill shall be cleaned up immediately and reported to the SE within 24 hours. Contaminated soil shall be excavated and disposed of at an MoERCC-approved facility.

6.3.3 Resource Efficiency

- Stone and aggregate shall be sourced locally to minimise transport distances and reduce vehicle emissions. All seedlings shall be planted within water-harvesting micro-structures to maximise rainfall capture and minimise supplemental water needs. Vehicles shall be maintained in good working order to reduce fuel consumption and emissions; unnecessary engine idling is prohibited.

6.4 SEA/SH Prevention and Code of Conduct

All workers employed under the Rako rangeland rehabilitation project are required to sign a Code of Conduct (CoC) before commencing work and to receive induction training on its contents. The CoC is binding on all workers regardless of contract type or duration. The minimum working age is 18 years for all works; age shall be verified using official identification before hiring. Forced labour is strictly prohibited and is grounds for immediate dismissal.

Key Code of Conduct clauses include:

- Prohibition of SEA/SH in any form, including against community members, other workers, and minors.
- Prohibition of sexual relations with minors and exchange of money, employment, goods or services for sex.
- Prohibition of harassment, intimidation, bullying or discrimination on grounds of gender, age, clan, disability or religion.
- Obligation to report any known or suspected SEA/SH incident through the confidential GM pathway immediately. Failure to report is a disciplinary offence.
- Disciplinary measures for CoC violations include immediate dismissal and referral to relevant authorities. Zero tolerance for SEA/SH.

SEA/SH-related grievances will be handled through a confidential, survivor-centred pathway that does not require written evidence, does not involve mediation with the alleged perpetrator, and ensures voluntary referral to qualified GBV service providers with survivor consent and data protection guaranteed.

6.5 Mitigation and Monitoring Plan

The following table presents the consolidated ESMP for Rako. It incorporates all environmental and social risks identified in Chapter 5 (including biodiversity risks, climate risks, grazing pressure, drainage alteration, water inefficiency, and pollution risks) and the social risks identified in this chapter. Each risk is accompanied by mitigation measures, monitoring method, frequency, responsible party, monitoring indicator, reporting line, and estimated cost.

Table 3: ESMP Mitigation and Monitoring Plan in Rako

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
ESS1	Soil disturbance and erosion from installation of rock dams, gabions and bunds.	Assign qualified E&S staff; integrate safeguards in supervision contracts; Contractor prepares C-ESMP. Minimize excavation footprint; immediately stabilize disturbed areas; place structures on stable foundations.	Site inspection checklist; visual observation of ground stability; review of C-ESMP.	Weekly during construction	Contractor/PCU	C-ESMP in place; no active erosion at structure sites; disturbed areas stabilized.	Monthly E&S site report by Contractor to SE and PCU.	300
ESS1; ESS4	Protection of Critical Infrastructure: Gully expansion threatening the Rako borehole and water supply system.	Prioritize check dams and gabions upstream of borehole; maintain 20m excavation-free buffer zone around borehole infrastructure; inspect borehole area after every significant rainfall event.	Visual inspection of borehole buffer zone; photo documentation after rainfall events.	After every rainfall >10mm; monthly (dry season)	Contractor/PCU	No gully advance toward borehole; buffer zone intact; borehole operational.	Monthly monitoring report; incident report if borehole threatened.	200
ESS1; ESS3	Soil and water conservation structures (bunds, rock dams) may alter natural drainage,	Technical drawings prepared by qualified soil/water conservation engineer before construction; structures reviewed and approved by MoERCC before works start; post-rain inspection	Review of engineering drawings; post-rain site inspection; photo documentation.	Design review: pre-construction. Post-rain inspection: within 48 hours of	Contractor; Supervising Engineer (SE); MoERCC	Approved engineering drawings on file; no drainage alteration or downstream flooding	Pre-construction design sign-off report; post-rain inspection records submitted to SE.	200

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	causing waterlogging or downstream erosion.	within 48 hours of first significant rainfall event.		rainfall >25mm.		observed; post-rain inspections completed.		
ESS3; ESS4	Dust emissions from movement of stone materials and dry-season earthworks.	Apply water spraying to active work areas during dry and windy conditions; limit vehicle speed to 20 km/h; schedule heavy material movement outside peak wind hours; halt dusty activities if complaints received.	Visual observation; community complaint log review.	Daily during construction	Contractor	No community complaints related to dust; low visible dust levels at site boundary.	Daily site log; dust complaints recorded in GM log and reported weekly to SE.	500
ESS3	Noise from manual works and limited equipment use affecting nearby residents.	Restrict all works to daytime hours (08:00-17:00); provide advance community notice of works schedule; avoid simultaneous noisy operations at multiple points.	Community complaint log review; verification of working hours.	Daily during construction	Contractor	No noise complaints from community; works consistently within 08:00-17:00.	Daily site log; noise complaints recorded in GM log and reported weekly to SE.	300
ESS3	Solid waste generation (seedling poly-bags, food waste, packaging). Fuel and oil pollution from	Collect all waste in designated receptacles; segregate organic (compost/bury on site) from non-organic (transport to nearest approved disposal facility in town); prohibit open burning and dumping in wadis; maintain daily waste log. Fuel: store in bunded	Weekly site inspection checklist; waste log review; visual check for oil stains near fuel storage; spill kit present check.	Weekly; immediate reporting of spills	Contractor; SE/PCU	Waste collection point present and in use; no visible litter; no oil stains near fuel storage; waste log maintained; no	Weekly E&S site report; spill incidents reported to SE and /PCU within 24 hours.	200

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	vehicles and water pumps.	containment min 50m from water sources including Rako borehole; maintain spill kit on site; designated refuelling area only; immediate clean-up and reporting of spills.				open burning observed.		
ESS6	Biodiversity risk: use of non-native or inappropriate reseeded species may harm local biodiversity and native seed bank.	Use only native Somali species previously tested and verified by MoERCC in prior Puntland rangeland rehabilitation projects; procure all seed from MoERCC-approved suppliers; conduct germination test to confirm purity and absence of invasive species before sowing; prohibit non-native, exotic or GM seeds without prior MoERCC written approval.	Review of seed procurement records and MoERCC supplier approval; germination test results on file before sowing.	Pre-planting (one-off verification)	Contractor; MoERCC/PCU	Seed procurement records showing MoERCC-approved supplier; germination test results on file; no non-approved species sown.	Pre-planting compliance report by Contractor to SE and PCU.	300
ESS1; ESS6	Climate risk: seedling mortality during extended dry spells in the first year after planting.	Select only drought-tolerant native Somali species previously tested by MoERCC; plant all seedlings within water-harvesting micro-structures (half-moons, bunds) to maximise rainfall capture; establish community-based aftercare plan designating community members responsible for aftercare	Community aftercare plan records; site visit to verify seedling survival rates; photo documentation at fixed monitoring points.	quarterly in first year	Community Committee/PCU and M&E Officer	Seedling survival rate >50% at end of first dry season; community aftercare plan operational; water-harvesting structures in place.	Quarterly environmental monitoring report to SE and PCU.	300

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
ESS1; ESS3	Climate risk: intense rainfall events may exceed design capacity of rock dams or bunds, causing structural failure including near the Rako borehole.	Engineer all structures with appropriate spillway design to safely pass peak flows; conduct post-rain inspection within 48 hours of any rainfall event exceeding 25mm; pay particular attention to structures near the Rako borehole to ensure no flood water redirected toward water infrastructure; repair any structural damage immediately.	Post-rain site inspection; photo documentation of structures before and after rainfall events.	Within 48 hours of rainfall >25mm	Contractor; SE	No structural failure after rainfall events; post-rain inspections completed and documented; repairs conducted within 72 hours of damage identification.	Post-rain inspection reports to SE; monthly construction report.	200
ESS1; ESS6	Climate risk: future droughts may kill established vegetation and reverse rehabilitation gains.	Establish vegetation monitoring baseline using fixed photo points and transect sampling before rehabilitation; implement rapid reseeding protocol if vegetation cover falls below 25% of established baseline; include climate risk in community rangeland management plan.	Bi-annual vegetation transect sampling and photo monitoring at fixed points.	Bi-annually (end of wet and dry seasons)	Community Rangeland Committee/ M&E Officer/PCU	Vegetation cover maintained at or above 25% of baseline; reseeding protocol activated if cover drops below threshold.	Bi-annual environmental monitoring report to PCU.	200
ESS1	Community grazing pressure: premature return of livestock before	Community committee and local elders to enforce community-agreed no-grazing period of 3 months through traditional rangeland governance mechanisms; post bilingual (Somali/English) no-grazing zone	Community committee monitoring records; site observation during no-grazing period; GM complaint	Monthly during no-grazing period	Community Committee/SE/PCU	No livestock observed in rehabilitation zone during no-grazing period; signage in place; community	Monthly community committee report to SE; included in monthly E&S site report.	200

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	vegetation establishment destroys rehabilitation investment.	signs at all entry points; livestock reintroduced gradually after the no-grazing period with low stocking rate for a further 3 months. Community protection mechanisms apply.	log review for livestock violations.			committee monitoring records maintained.		
ESS2	Child and forced labour risk: employment of workers below minimum age (18 years) or under coercive conditions.	Verify age of all workers before hiring using official identification; maintain worker registry with age verification records; prohibit child labour and forced labour both are grounds for immediate dismissal; prioritize local hiring with written contracts specifying employment terms, wages, working hours and grievance rights; post minimum age requirement visibly at site.	Review of worker registry and contracts; random spot checks of worker ID; worker interviews on employment terms.	Pre-works; monthly spot checks	Contractor/SE	Worker registry complete with verified ages; no workers under 18 on site; all workers hold signed contracts.	Monthly labour compliance report by Contractor to SE and PCU.	300
ESS2	Poor working conditions, excessive hours, employment discrimination, disputes related to pay, working hours, and lack of	Ensure all workers informed of employment terms before starting; comply with applicable labour laws on working hours; prohibit discrimination on grounds of gender, clan, age or disability; establish a workers' GRM separate from community GM with named focal person and clear escalation path; post	Review of worker complaint logs; interview sample of workers; verify workers' GRM posted and functional.	Monthly	Contractor/ SE	No unresolved pay disputes; workers' GRM operational and known to workers; no discrimination complaints.	Monthly labour compliance report by Contractor to SE and PCU.	200

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	workers' Grievance Redress Mechanism (GRM).	workers' GRM contact details at site; resolve pay disputes within 7 days.						
ESS2	OHS risks: heat stress, fatigue, manual handling injuries, cuts and falls during stone work.	Provide adequate drinking water (min 3 litres/worker/day); enforce 30-minute rest break every 2 hours during peak heat (10:00-15:00); provide PPE (gloves, safety boots, sun hats); conduct weekly toolbox talks on safe manual handling; maintain stocked first-aid kit on site; ensure workers know emergency procedures.	Daily site inspection; incident log review; PPE spot check; toolbox talk attendance register.	Daily	Contractor/ SE	No heat-related or OHS incidents; PPE in use; weekly toolbox talks held; first-aid kit stocked.	Daily site log; incidents reported to SE and PCU within 24 hours.	500
ESS2; ESS10	SEA/SH and worker misconduct risk from worker-community interaction.	All workers sign Code of Conduct (CoC) before starting work and receive induction training. CoC prohibits: SEA/SH, sexual relations with minors, exchange of favours for sex, harassment and discrimination. Disciplinary measures include immediate dismissal. Obligation to report SEA/SH through confidential GM pathway stated in CoC. Minimum working age is 18. Conduct SEA/SH awareness sessions for	Review of signed CoC records; attendance register for awareness sessions; GM log review for SEA/SH cases.	CoC signing: pre-works. Awareness sessions: monthly. GM log: continuous.	Contractor; SE; PCU	All workers signed CoC before work start; induction completed; no unresolved SEA/SH cases; confidential pathway operational.	Monthly safeguards report to SE and PCU; SEA/SH incidents reported within 24 hours through confidential pathway.	200

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		workers and community monthly. SEA/SH GM pathway is confidential, survivor-centred, does not require written evidence.						
ESS4	Community health and safety: injury to community members from open work areas, falling stones, and uneven terrain.	Install Somali-language warning signs at all work site entry points; restrict public access to active work areas with rope barriers; inform community leaders before works commence each day; maintain first-aid kit on site; assign safety officer for community access control.	Daily site inspection; signage check; first-aid kit check; community notification records.	Daily during construction	Contractor/ SE	Warning signs in place; no unauthorised persons in active work zones; no community injury incidents.	Daily site log; incidents reported to SE and PCU within 24 hours.	200
ESS4	Livestock injury risk from open excavations, stone stockpiles and uneven ground near construction activities.	Coordinate work schedule with community committee to avoid active construction during peak livestock movement times (early morning and late afternoon); maintain safe livestock passage routes around work areas; install barriers to keep livestock away from active excavation and stockpile areas.	Community consultation records on livestock movement times; site observation during livestock movement periods.	Daily during active construction	Contractor; Community Committee	No livestock injury incidents at or near work sites; livestock passage routes maintained.	Daily site log; livestock incidents reported to SE immediately.	200

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
ESS4	Minor traffic safety risk from vehicle movements on access routes.	Control vehicle speed (max 20 km/h) on all access routes; place warning signs on access routes; assign flagman during heavy material delivery; all vehicles roadworthy and drivers licensed.	Vehicle speed and signage check; driver licence verification.	During material delivery and vehicle movements	Contractor	No traffic incidents; warning signs in place; vehicles roadworthy.	Weekly E&S site report.	100
ESS4	Security risk management.	No armed security personnel will be used on this project, which reduces ESS4 security risks. Site access control managed by community committee and site safety officer using barriers and signage only.	Confirm no armed security present at site.	Project start; monthly spot check	PCU/ Contractor	No armed security on site; access managed through community-based mechanisms.	Noted in project inception report; monthly safeguards report.	100
ESS5	Temporary access restriction to rangeland rehabilitation area during works and no-grazing period. Note: No homes or permanent livelihood assets will be blocked. Only the	Agree access restriction schedule with community, herders and farmers before works commence; provide clear bilingual (Somali/English) signage on alternative routes; maintain all existing pathways and community access routes outside the rehabilitation area; monitor complaints through GM; community committee to communicate no-grazing boundaries clearly.	Community consultation records; GM complaint log review; site observation of access routes; signage inspection.	Before works start; weekly during construction; monthly during no-grazing period	Contractor; Community Committee; SE	No complaints on blocked access to homes or livelihood areas; alternative routes signposted; community informed of no-grazing boundaries.	Monthly E&S site report; access complaints in GM log.	200

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	rehabilitation area will be subject to temporary no-grazing closure.							
ESS10	Inaccessible Grievance Mechanism (GM), insufficient stakeholder engagement, and inadequate disclosure of project documents.	Display GM information (FSRP Hotline 3060) at project site and community gathering points; hold community meetings before and during works; designate GM focal person known to community; ensure project documents available for community review on request; record all grievances in GM register; acknowledge within 48 hours; resolve within 7-14 days; escalate unresolved cases to District Administration and PCU	GM register review; community meeting attendance records; site GM information display check.	GM: continuous. Community meetings: project start, mid-point, end. Display check: monthly.	PCU/ Contractor	GM information displayed and accessible; community meetings held per schedule; all grievances acknowledged within 48 hours; no unresolved cases beyond 14 days.	Monthly safeguards report by PCU to World Bank; GM summary included.	100

6.6 Outcome-Based Environmental Monitoring Plan

In addition to the activity-level monitoring in Table 4, the following outcome-based monitoring plan tracks the environmental results of the Rako rehabilitation works. Budget for monitoring activities is included in the ESMP Implementation Budget (Section 6.7).

Table 4: Rako Outcome-Based Environmental Monitoring Plan

Environmental Parameter	Indicator	Baseline (Pre-Project)	Target (Year 1-2)	Data Collection Method	Frequency	Responsible Party
Vegetation Cover	% ground cover; number of native species present.	Low cover (estimated 10-20%); degraded species mix.	30% ground cover; native grass and shrub species.	Transect sampling (50m line transects at fixed photo points); visual assessment.	Annually at end of wet season	M&E Officer / Rangeland Specialist
Soil Erosion Status	Presence and size of active rills/gullies; sedimentation in water points.	Active gullies and rills present at rehabilitation site.	Gullies stabilized; no new rill formation; sedimentation in water points reduced.	Visual assessment and photo documentation at fixed monitoring points.	Bi-annually (wet and dry season)	Community Rangeland Committee; M&E Officer, Rangeland Specialist
Seedling Survival Rate	% survival of planted seedlings at end of first dry season.	No seedlings planted (pre-project).	Minimum 60% seedling survival at end of first dry season.	Count of surviving seedlings at fixed sample plots; photo documentation.	Monthly (year 1); quarterly (year 2)	Community Committee; M&E Officer, Rangeland Specialist
Structure Integrity	Condition of rock dams, gabions and bunds after rainfall events.	Structures newly installed.	All structures intact and functional 12 months after completion.	Post-rain visual inspection and photo documentation within 48 hours of rainfall >25mm.	Within 48 hours of rainfall >25mm	Contractor (during works); Community Committee (post-works), Rangeland Specialist

Environmental Parameter	Indicator	Baseline (Pre-Project)	Target (Year 1-2)	Data Collection Method	Frequency	Responsible Party
Grazing Rest Compliance	Compliance with no-grazing period (3 months) in rehabilitation zone.	No formal rest period enforced prior to project.	100% compliance with community-agreed no-grazing period; no livestock in rehabilitation zone during closure.	Community committee monitoring records; site observation; GM complaint log.	Monthly during no-grazing period	Community Committee; SE

6.7 ESMP Implementation Budget

The implementation of the Environmental and Social Management Plan (ESMP) for the Rangeland Rehabilitation in Rako requires financial resources to support mitigation measures during the implementation phase of rehabilitation activities, including site safety, occupational health and safety (OHS), minor waste management, environmental monitoring, and community engagement.

The total cost for implementing ESMP measures is estimated at **USD 5,000** covering key activities such as PPE provision, community awareness, monitoring of environmental and social safeguards, and implementation of mitigation measures during field works. Given the nature of the project as a low-impact, nature-based intervention, no significant operational or long-term ESMP costs are anticipated.

Sustainability of ESMP monitoring after project completion will be ensured by continued oversight by local authorities and MoERCC, with integration of environmental and social considerations into ongoing rangeland management practices. Monitoring responsibilities will be handled by relevant government institutions with periodic follow-up, ensuring continued compliance beyond project closure without significant additional costs.

6.8 Grievance Mechanism (GM)

A project-level Grievance Mechanism (GM) has been established to enable workers, community members, and other stakeholders to raise concerns related to the implementation of rangeland rehabilitation activities in Rako. The GM is accessible, transparent, and culturally appropriate, and aligns with World Bank ESS10. Its purpose is to provide timely resolution of complaints, strengthen accountability, and maintain constructive engagement with affected communities.

Grievances may relate to implementation impacts such as dust, minor noise, labor issues, access restrictions, or community safety concerns during field activities. All complaints verbal, written, or anonymous will be received respectfully and handled without discrimination or fear of retaliation.

SEA/SH-related complaints will be handled through a confidential, survivor-centered GM pathway that does not require written evidence, does not involve mediation with alleged perpetrators, and ensures voluntary referral to qualified GBV service providers, with survivor consent, data protection, and protection from retaliation guaranteed at all times.

Complaints may be submitted to the Contractor during implementation activities. Community leaders and a complaint box at the site will also serve as additional channels. Once received, grievances will be recorded in a GM register and acknowledged within 48 hours. Most cases should be resolved within 7–14 days. If unresolved, they will be escalated to the District Administration and then to the SPCU Safeguards Team. As a last resort, complainants may seek redress through the formal legal system.

Information on the GM, including procedures and contact details, will be shared through community meetings and posters displayed at the project site and within the community including the **FSRP Hotline (3060)**. A designated GM focal person will manage registration and follow-up. Sensitive cases such as SEA/SH or GBV will be handled confidentially and referred to qualified service providers using a survivor-centered approach.

The SPCU will periodically review grievance records, ensure corrective actions are implemented, and prepare summary reports to support continuous improvement of environmental and social performance.

7. Compliance and Coordination

This chapter summarizes the institutional framework for ensuring compliance and coordination in the planning and implementation of the Rangeland Rehabilitation Project in Rako. It describes the mandates, responsibilities, and reporting lines of all key institutions and actors involved in ESMP implementation.

7.1 Institutional Roles and Responsibilities

Table 1 provides a consolidated overview of the roles and responsibilities of each institution and actor involved in ESMP compliance for the project.

Table 5: Institutional Roles and Responsibilities for ESMP Compliance

Institution / Actor	Mandate / Role	Key Responsibilities for ESMP Compliance	Coordination / Reporting Line
MoERCC (Ministry of Environment, Range and Climate Change)	Lead technical owner for rangeland rehabilitation and natural resource management.	Oversees planning and implementation of rangeland rehabilitation activities; ensures soil and water conservation, vegetation restoration, and sustainable land management practices; leads environmental compliance monitoring and corrective actions; enforces EIA Act provisions; inspects waste management, vegetation clearance, and drainage systems.	Coordinates with District Administration and PCU; reports through project structures.
Rako District Administration	Local authority; permitting and local oversight.	Confirms local approvals and communal land status; supports enforcement of local bylaws (waste, sanitation, access control); supports community engagement and issue resolution; supports solid waste collection and disposal; facilitates GM activities.	Coordinates with MoERCC and PCU; links to local security and community leaders as needed.
PCU / Project Coordination Unit MoAI (Safeguards Team)	ESF oversight for the subproject; World Bank safeguards compliance.	Ensures ESMP implementation; reviews and approves contractor C-ESMP and OHS plans; monitors compliance including labour, OHS, stakeholder engagement, and GM; consolidates E&S reports; oversees complaints logging; coordinates between ministries; supports reporting, incident management, and corrective action follow-up.	Reports to implementing agency / project management; coordinates with MoERCC, Municipality, and Supervising Engineer.

Institution / Actor	Mandate / Role	Key Responsibilities for ESMP Compliance	Coordination / Reporting Line
Supervising Engineer (SE)	Day-to-day construction supervision.	Confirms contractor compliance with ESMP/C-ESMP; verifies OHS, waste, traffic management, and community safety measures; documents non-compliances and instructs corrective actions; ensures proper installation of soil and water conservation structures (rock dams, gabions).	Reports to PCU and implementing agency; coordinates daily with Contractor and focal points.
Contractor	Executes civil works.	Prepares and implements C-ESMP, OHS plan, waste management, traffic/access controls, dust/noise control, worker Code of Conduct, SEA/SH prevention measures, and community safety actions; assigns dedicated EHS focal person and GBV/GM focal person; provides PPE; keeps records (trainings, incidents, inspections); reports incidents immediately.	Reports to Supervising Engineer; provides monthly E&S reports; notifies incidents immediately.
Community Representatives (Elders, Women, Youth)	Community interface and feedback channel.	Supports awareness and feedback; helps identify community concerns (access, safety, noise/dust); supports dispute resolution at community level; promotes use of GM; participates in consultations; supports protection of rehabilitated areas and promotes sustainable use of rangeland resources.	Coordinates with Municipality/MoERCC; channels issues to GM focal point for formal registration.

7.2 Key Institutional Mandates

The following sub-sections describe the specific mandates of each institution in greater detail.

a. Ministry of Environment, Range and Climate Change (MoERCC)

- Monitor environmental compliance and enforce EIA Act provisions.
- Lead technical oversight of rangeland rehabilitation and ecosystem restoration activities.
- Inspect waste management, vegetation clearance, and drainage systems.
- Provide technical guidance on soil and water conservation, vegetation restoration, and sustainable land management practices.

- Coordinate with the PCU and local authorities on environmental performance and reporting.

b. Ministry of Agriculture and Irrigation (MoAI) — S-FSRP Implementing Partner

- Coordinate safeguards implementation as the FSRP implementing partner.
- Supervise construction activities and approve contractor C-ESMPs.
- Monitor environmental and social (E&S) compliance and report to the PCU.

c. Rako Municipality / Galkacyo District Administration

- Support local coordination and implementation of project activities.
- Support solid waste collection and disposal in the project area.
- Facilitate community engagement and Grievance Mechanism (GM) activities.
- Ensure local compliance with construction and public health regulations.

d. S-FSRP Puntland Project Coordination Unit (PCU)

- Provide overall oversight of ESMP implementation and ensure adherence to World Bank ESS requirements.
- Consolidate E&S reports and oversee GM complaints logging.
- Review and approve contractor ESMPs and OHS plans.
- Coordinate between ministries and provide technical backstopping and E&S supervision support.

e. Contractor and Supervising Engineer

The Contractor is responsible for:

- Preparing and implementing a Contractor's Environmental and Social Management Plan (C-ESMP), covering OHS, waste management, traffic management, emergency preparedness and response, a Workers' Code of Conduct, SEA/SH mitigation measures, and a Workers' GM.
- Providing PPE, enforcing OHS procedures, maintaining records, and reporting incidents immediately.
- Ensuring safe handling of fuels, materials, and construction wastes, and protection of surrounding land and community areas.
- Assigning a dedicated Environmental, Health, and Safety (EHS) focal person and a dedicated GBV/GM focal person throughout implementation.
- Complying with ESS2, ESS3, ESS4, and ESS10 requirements.

The Supervising Engineer is responsible for:

- Conducting routine monitoring of contractor performance and verifying compliance with ESMP, OHS, and quality assurance standards.
- Confirming contractor compliance with the ESMP/C-ESMP and verifying implementation of OHS, waste, traffic management, and community safety measures.
- Issuing corrective action instructions when non-compliances are identified.
- Ensuring proper installation and performance of soil and water conservation structures (rock dams, gabions).
- Documenting non-compliances and providing weekly E&S reporting.

f. Community Representatives (Elders, Women, Youth)

- Participate in consultations and provide feedback through the GM.
- Help identify and report community concerns related to implementation activities (access, safety, noise, dust, land use).
- Support dispute resolution at the community level and promote use of the GM.
- Support protection of rehabilitated areas and promote sustainable use of rangeland resources.

7.3 Coordination and Reporting Lines

Effective ESMP implementation requires clear lines of communication and accountability across all levels. The following principles govern coordination:

- The PCU (MoAI) serves as the central coordination hub, linking the implementing ministries, the Supervising Engineer, and the Contractor.
- MoERCC provides technical leadership on all environmental and rangeland matters and reports through project structures.
- The Supervising Engineer acts as the primary interface between the PCU and the Contractor on a day-to-day basis.
- The Contractor reports monthly E&S performance to the Supervising Engineer and notifies incidents immediately.
- The Municipality/District Administration coordinates locally with MoERCC and the PCU, and connects with community leaders and security actors as needed.
- Community Representatives channel concerns to the GM focal point for formal registration and resolution.

8. Stakeholder Consultation

8.1 Introduction

Stakeholder consultation was undertaken as part of the environmental and social assessment for the Rangeland Rehabilitation Project in Rako District to ensure that community members, local authorities, and relevant institutions were informed about the project and had the opportunity to express their views, concerns, and expectations. The consultation process aligns with World Bank ESS10 and emphasizes transparency, inclusiveness, and participation of all affected groups.

Consultations were held in Rako with community leaders, pastoralists, women and youth groups, and district officials. Their inputs informed project design, selection of the Kodmo intervention site, and the development of mitigation measures included in this ESMP.

8.2 Objectives of the Consultation Process

Stakeholder consultations were conducted to:

- Inform the community about the purpose, scope, and expected benefits of the rangeland rehabilitation interventions.
- Seek views on environmental and social risks and mitigation measures.
- Confirm community acceptance of the selected intervention sites within communal land.
- Identify vulnerable groups and ensure their inclusion.
- Build community support for the implementation of soil and water conservation measures.
- Establish communication channels for feedback and grievance handling.

8.3 Stakeholders Consulted

Consultations involved a broad range of stakeholders, including:

- Community elders and traditional leaders
- Rako District Administration
- Women's representatives and youth groups
- Pastoralist households and farmers

- Local community members from Rako
- Village Development Committee (VDC)

The consultation attendance sheet confirms broad participation and representation from different segments of the community.

8.4 Summary of Consultation Activities Conducted

Consultations included:

- A community meeting in Rako attended by elders, women, youth, pastoralists, and farmers.
- Site visits and discussions on land condition, erosion challenges, and proposed intervention areas.
- Meetings with district administration officials regarding project implementation support and coordination.
- Discussions with community members on rangeland degradation, erosion risks near the borehole, and restoration priorities.
- Awareness sessions on the Grievance Mechanism (GM) and community roles during implementation.

The community demonstrated strong interest in the project and expressed readiness to collaborate during construction and operation.

8.5 Issues Raised by the Community and Responses Provided

Table 6: Issues Raised by the Community and Responses Provided

Key Issues Raised by Stakeholders	Responses / Actions Integrated in the ESMP
Concern about gully expansion threatening the Rako borehole and water supply system	Intervention prioritizes Kodmo gully stabilization using rock check dams to protect the borehole and reduce erosion risk
Loss of grazing land and reduced pasture availability due to erosion	Rehabilitation measures will restore degraded rangeland, improve vegetation cover, and enhance grazing capacity
Risk of further gully expansion during heavy rainfall events	Design includes staged runoff control structures to reduce flow velocity and stabilize the gully system
Request for fair and transparent local labor recruitment	Recruitment will prioritize local workers, with VDC supporting fair selection and transparency
Questions on how complaints will be handled during implementation	GM (Hotline 3060) explained; local focal point assigned and process clarified to community
Safety concerns for livestock and people near deep gullies	Contractor will establish safe working zones, install warning signs, and control access during implementation

8.6 Stakeholder Feedback on the Project Site

Stakeholders confirmed that:

- The project site is located on communal rangeland with no individual ownership or disputes
- The selected site (Kodmo gully area) is identified by the community as one of the most critical erosion hotspots, requiring urgent intervention
- There is strong concern that continued gully expansion could directly threaten the Rako borehole and water supply infrastructure, which is a vital resource for the community
- The intervention area is important for livestock movement routes and access to grazing areas, and erosion has already disrupted these pathways
- The project will not cause displacement or negatively affect livelihoods, but instead is expected to restore degraded grazing land and improve access
- The community emphasized the need for timely implementation to prevent further erosion damage, particularly during upcoming rainy seasons
- Community members expressed willingness to support protection of the rehabilitated area, including regulating grazing and preventing damage to installed structures;

8.7 Consultation Outcomes

The consultation process resulted in the following outcomes:

- Strong community and local authority support for the Rako rangeland rehabilitation intervention, recognizing it as a priority for protecting livelihoods and key resources;
- Clear consensus on the urgency of addressing gully erosion, particularly due to its direct and increasing threat to the Rako borehole and water supply system, as well as surrounding grazing areas;
- Agreement that the Kodmo gully site is the highest priority intervention area, given its proximity to critical infrastructure and severity of erosion;
- Increased awareness among community members on watershed management, erosion control measures, and the importance of protecting soil and vegetation in an extremely arid environment;
- Community willingness to participate in post-rehabilitation management, including controlled grazing practices and safeguarding of installed structures;
- Awareness created on project activities, environmental and social risks, and the Grievance Mechanism (GM), including use of the FSRP Hotline (3060);
- Inclusion of community feedback into project planning, particularly in site prioritization (Kodmo), labor recruitment approaches, and risk mitigation measures related to erosion and infrastructure protection.

8.8 Ongoing Stakeholder Engagement Plan

This section describes the ongoing stakeholder engagement activities that will be carried out throughout the project implementation cycle at Rako. Regular and structured engagement with the community ensures transparency, early identification of grievances, and sustained community ownership of the rehabilitation works.

8.8.1 Regular Community Meetings

Regular meetings will be held with community elders, the Village Development Committee (VDC), and other stakeholders at three key milestones: project start, mid-point, and completion of works. Additional meetings will be convened if significant issues arise during implementation. Meetings will use existing community structures and gathering points (e.g., schools, community halls, or established meeting points) to maximize attendance and minimize barriers to participation.

The engagement schedule will include:

- **Project Inception Meeting:** Held before works commence to brief the community on the implementation timeline, no-grazing period (3 months), site boundaries, worker Code of Conduct, and how to access the Grievance Mechanism.
- **Mid-Implementation Meeting:** Held at the midpoint of construction works to review progress, address any emerging issues or complaints, and reconfirm the no-grazing period boundaries and expectations.
- **Completion and Handover Meeting:** Held at the end of construction to formally handover the rehabilitated area to the community, confirm post-rehabilitation monitoring responsibilities, and review the community-based grazing management plan.
- **Post-Rehabilitation Follow-up:** A follow-up meeting will be held 3 months after project completion to review vegetation recovery progress, address any re-invasion or structural issues, and reaffirm community protection commitments.

8.8.2 Dedicated Engagement with Women and Youth

Separate consultation sessions will be held specifically for women and youth groups at each key engagement milestone. These sessions will be held at times and locations convenient for women (e.g., after morning domestic activities) and will be facilitated by a trusted female focal person where possible. Women-only sessions will create a safe space to raise concerns related to safety, labor, SEA/SH risks, and livelihood impacts that may not be raised in mixed-gender community meetings.

Youth engagement sessions will focus on employment opportunities, awareness of the no-grazing period, and the importance of protecting installed structures.

8.8.3 Information Sharing Using Existing Community Structures

Project information will be shared through existing community communication channels to ensure all community members are informed, including those who do not attend formal meetings. These channels include:

- **Community elders and traditional leaders:** Elders serve as trusted information intermediaries and will be briefed by the GM focal person monthly to cascade information to their communities.
- **Site notice board:** A notice board at the project site will display the project summary, implementation schedule, no-grazing zone boundaries, and GM contact information (Hotline 3060) in Somali language.

- VDC meetings: The GM focal person will provide a monthly update to the VDC on project progress, grievances received, and actions taken.

8.9 Overall Conclusion

Overall, the consultation process confirmed that the project is highly relevant to the needs of the Rako community, particularly in addressing severe land degradation and protecting critical water infrastructure. The strong engagement of community members and local institutions, combined with their commitment to support implementation and post-rehabilitation management, demonstrates a high level of ownership and readiness. The feedback received has been effectively integrated into the ESMP, ensuring that the intervention is technically appropriate, socially acceptable, and responsive to the specific environmental risks and livelihood priorities of Rako.

9. Conclusion

The Environmental and Social Management Plan (ESMP) for the Rangeland Rehabilitation Project in Rako provides a comprehensive framework to ensure that the project is implemented in an environmentally sound, socially responsible, and sustainable manner. The assessment confirms that the potential impacts associated with the implementation of rehabilitation activities are site-specific, predictable, and manageable through the mitigation measures proposed.

Effective implementation of the ESMP including the application of appropriate soil and water conservation measures (rock check dams at the Kodmo gully site), proper site management, adherence to occupational health and safety requirements will minimize risks to workers, local communities, and the surrounding environment while enhancing positive outcomes.

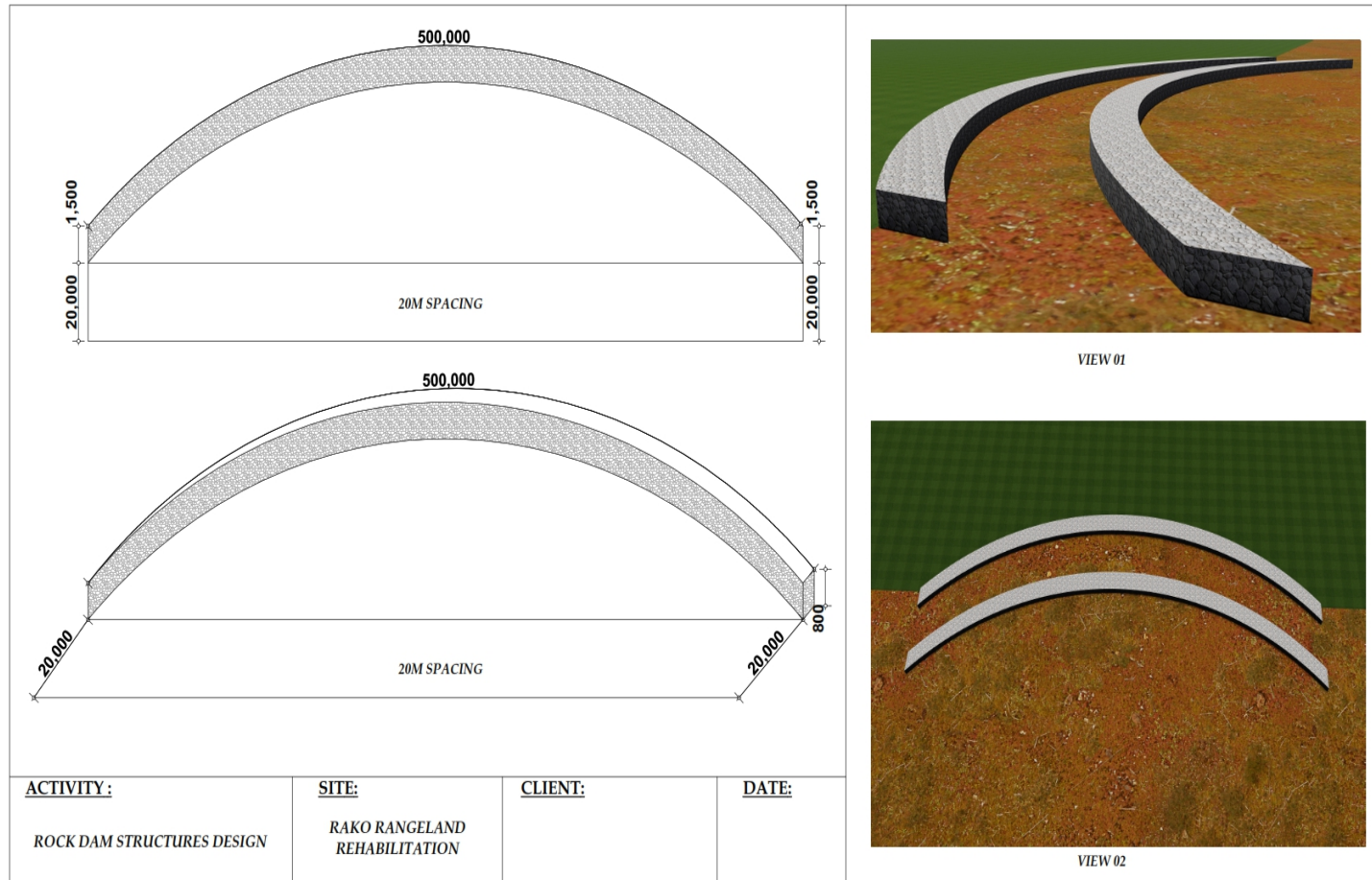
A key benefit of the intervention is the stabilization of the Kodmo gully, which will significantly reduce the risk of further erosion threatening the Rako borehole and water supply infrastructure, a critical resource in this extremely arid environment.

Stakeholder consultations demonstrated strong support from both local authorities and community members, particularly pastoral communities, who are directly affected by land degradation and gully erosion. The community emphasized the urgency of the intervention due to the increasing risk to grazing land, livestock movement routes, and essential water infrastructure, and expressed willingness to support implementation and long-term protection of the rehabilitated area.

Overall, the ESMP confirms that the Rako rangeland rehabilitation intervention can be implemented safely and in full compliance with national environmental requirements and World Bank Environmental and Social Standards. Continued monitoring, reporting, and engagement with stakeholders will ensure that environmental and social performance is maintained and that the project contributes to restoration of degraded rangeland, protection of critical water resources, improved grazing productivity, and sustainable management of natural resources.

10. Annexes

10.1. Designs/ Layout Drawings



10.2. Stakeholder Consultation meetings' participant lists

A. ATTENDANCE SHEET FORMAT

Community Meeting: local Community meeting

Location: Rato

Date: 04/04/2026

#	Name	Gender	Position	Mobile No.	Signature
1	Mumino Ahmed Ibrahim	Female	Pastoral		
2	Maryam Ali Jama	Female	" "		
3	Faaduno Cali Maxed	Female	" "		
4	Xirsiyo Maxamud Cise	Female	" "		
5	Warsen Shire Salsx	Female	" "		
6	Yurub Maxamud Sici	Female	" "		
7	Xalimo Comar Maxed	Female	" "		
8	Fadumo Maxed Kulwe	Female	" "		
9	Xalimo Bame Axaw	Female	" "		
10	Karadi Jibril Muse	Female	Local Community		Karadi
11	Maryam Khatir Hani	Female	" "		
12	Fawser Jama Galle	Female	" "		
13	Johro Cabdi Xirsi	Female	Pastoral		

Roko

#	Name	Gender	Position	Mobile No.	Signature
14	Abdilaahi Khamad Dahir	M	Community		
15	Abdisalan Mux Abdulkadir	M	Community		
16	Abdi Mohamed Issa	M	Community		
17	Saad Jama Mohamed	M	Community		
18	Jama Ceele Mohamed	M	Community		
19	Omar Mohamed Afari	M	Community		
20	Calisaalax maxed saalax	M	Community		
21	Haashin Nuur Maxamud	M	Community		
22	Salad Nuur Adan	M	Community		
23	Saadiq Macalin Jama	M	Community		
24	Siciid Yousuf Maxud	M	Community		
25	Clfuraay Siciid Cumar	M	pastoral		
26	cali Clgaadir cali	M	pastoral		
27	Qaasin Chixmaan Ismail	M	community		
28	Siciid Yaasiin Yusef	M	pastoral		

Wako

#	Name	Gender	Position	Mobile No.	Signature
29	Alesho Ahmed Coman	Female	Pastoral		
30	Johro Jibril Salax	Female	" "		
31	Fasrax Maxed Helen	male	" "		
32	Maxamud Nur Maxid	male	Youth		
33	Abdirahman Cali Cal	Male	Youth		
34	Abdirahman Mahid Ali	male	Youth		
35	David Fereh Mohamed	male	Youth		
36	Phadia Shire Mohamed	Female	pastoral		
37	Khayre Maxed Ahmed	male	pastoral		
38	Gyadid Alixax Fereh	male	Youth		
39	Maxamud Said Maxid	male	Youth		
40	Maxamud Mahid Ali	male	Youth		
41	Abdulahi Mahid Ismael	male	Youth		
42	Abshir Xareed Ahmed	male	Youth		
43	Jasmax Salax Fereh	male	pastoral		

10.3 ES Screening Checklist



ES Screening Form-
Rako.docx

10.4. Photos for Site Observation



