



Ministry of Livestock, Forestry and Range
Jubbaland State of Somalia

Somalia Food Systems Resilience Project (S-FSRP)

Environmental and Social Management Plan (ESMP)

Construction of Livestock Market in Dhobley District

Prepared for:

SPCU

Jubaland State

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List of Abbreviations and Acronyms

Abbreviation / Acronym	Full Term
BOQ	Bill of Quantities
C-ESMP	Contractor's Environmental and Social Management Plan
CIG	Community Interest Group
CSA	Climate-Smart Agriculture
DDC	District Development Committee
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EHSG	Environmental, Health and Safety Guidelines
EIA	Environmental Impact Assessment
EPRP	Emergency Preparedness and Response Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FGS	Federal Government of Somalia
FGM/C	Female Genital Mutilation/Cutting
FMS	Federal Member State
FPO	Farmer Producer Organization
FSRP / S-FSRP	Food Systems Resilience Project / Somalia Food Systems Resilience Project
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GM	Grievance Mechanism

GPS	Global Positioning System
GM	Grievance Mechanism
GRS	Grievance Redress Service
HSE	Health, Safety and Environment
IDP	Internally Displaced Person
IPMP	Integrated Pest Management Plan
LMP	Labor Management Procedures
LTI	Lost Time Injury
M&E	Monitoring and Evaluation
MIS	Management Information System
MoAI	Ministry of Agriculture and Irrigation
MoLFR	Ministry of Livestock, Forestry and Range
NALRI	National Animal and Livestock Research Institute
NPCU	National Project Coordination Unit
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
PAP	Project Affected Person
PCU	Project Coordination Unit
PDO	Project Development Objective
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
RACI	Responsible, Accountable, Consulted and Informed
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SAIC	Social Accountability and Integrity Committee
SEA	Sexual Exploitation and Abuse

SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Security Management Plan
SPCU	State Project Coordination Unit
TIMPs	Technologies, Innovations and Management Practices
USD	United States Dollar
VAC	Violence Against Children
VMG	Vulnerable and Marginalized Group
WASH	Water, Sanitation and Hygiene
WB	World Bank
WBG	World Bank Group
WHO	World Health Organization
WMP	Waste Management Plan

Executive Summary

This Environmental and Social Management Plan (ESMP) has been prepared for the proposed Livestock Market Construction in Dhobley, Afmadow District under a World Bank-supported development program, in compliance with the World Bank Environmental and Social Framework (ESF) and applicable Federal Government of Somalia and Jubaland State regulations. The ESMP aims to identify, assess, and manage potential environmental and social risks associated with the construction and operation of the livestock market, and to ensure that appropriate mitigation measures are effectively implemented throughout the project lifecycle.

The proposed livestock market is designed to improve livestock trade infrastructure, strengthen market access for pastoralists and traders, enhance animal health management, and promote local economic growth. The subproject will involve the construction of livestock holding pens, auction yards, loading ramps, veterinary inspection areas, water supply points, sanitation facilities, drainage systems, and designated waste management areas.

Environmental and social risks associated with the subproject are site-specific, predictable, and manageable through standard mitigation measures and good international industry practice. Anticipated environmental impacts include dust and noise during construction, improper disposal of construction waste, animal manure accumulation, wastewater generation, localized soil disturbance, and limited vegetation clearance. Social risks may include temporary disruption of trading activities, occupational health and safety risks for workers and livestock handlers, community health and safety concerns related to livestock movement and traffic, and potential zoonotic disease risks if veterinary controls are not properly enforced.

Based on the environmental and social screening, the subproject has been classified as **Moderate Risk**. This classification reflects construction-related impacts, waste generation, occupational health and safety risks, community health and safety considerations, labor management issues, and risks related to GBV/SEA/SH. These risks are not expected to be significant, irreversible, or unprecedented and can be effectively mitigated through the implementation of appropriate management measures.

The land identified for the livestock market is government-owned and has been confirmed through consultations with district authorities and community representatives. No physical or economic displacement is anticipated. Stakeholder consultations were conducted with local authorities, livestock traders, pastoralist representatives, women and youth groups, and veterinary officers. Feedback indicated strong community support and emphasized the need for improved hygiene, disease control, structured livestock marketing systems, and increased income opportunities.

The ESMP outlines key mitigation measures, including the preparation and implementation of a site-specific Environmental, Social, Health and Safety (ESHS) Plan; enforcement of occupational health and safety procedures; proper solid waste and manure management; effective drainage and wastewater control; dust and noise suppression; and traffic and community safety management. Measures to address GBV/SEA/SH risks, including confidential reporting pathways, will be implemented, along with emergency response procedures throughout the project cycle. A

comprehensive Grievance Mechanism (GM), including confidential handling of SEA/SH cases and integration of the FSRP toll-free hotline (560), will be established and maintained.

The Contractor will be contractually required to prepare and implement a Contractor's Environmental and Social Management Plan (C-ESMP), to be submitted for approval at least 14 days prior to mobilization. The Environmental, Social, Health and Safety (ESHS) Plan must be approved before commencement of works. The GBV/SEA/SH Action Plan and Worker Grievance Mechanism (GM) shall be operational prior to the deployment of the first worker, while the Community GM shall be disclosed and functional before the start of construction activities.

Oversight and supervision will be provided by the State Project Coordination Unit (SPCU) and supervising engineers to ensure full compliance with ESF requirements. Roles and responsibilities for implementation, monitoring, and reporting are clearly defined for the Contractor, Supervising Engineer, Project Coordination Unit, and relevant local authorities.

In conclusion, the Livestock Market subproject in Dhobley is considered environmentally and socially feasible. With the effective implementation of the proposed mitigation and monitoring measures, the project is expected to deliver significant socio-economic benefits, including improved livestock trade efficiency, strengthened livelihoods for pastoral communities, enhanced public and animal health standards, and increased resilience of the local livestock economy.

1. Introduction

1.1 Project Background

The Jubbaland state of Somalia (FMS) under the Ministry of Agriculture and Irrigation has received financial support from the World Bank under the Somalia Food Systems Resilience Project (S-FSRP, P177816). The Somalia Food Systems Resilience Program (FSRP) is a World Bank–supported regional initiative designed to address the root causes of food insecurity and reduce vulnerability to climate shocks, crises, and conflict. Implemented through a Multi-Phase Programmatic Approach, the program focuses on strengthening Somalia’s agri-livestock systems and building resilient, inclusive, and sustainable food systems at community, national, and regional levels.

The program supports investments across the “5Is” framework Infrastructure, Institutional Capacity, Innovation, Inclusion, and Integration. Key interventions include revitalizing agricultural and livestock research institutions, improving seed systems and extension services, expanding water and rangeland management, strengthening animal health services, and enhancing value chains, food safety, and market integration. The project also promotes climate-smart technologies, digital innovations, and locally adapted practices to boost productivity and resilience.

FSRP places strong emphasis on inclusive farmer institutions, producer organizations, women-owned enterprises, and access to finance and markets through digital platforms. It builds on and complements existing resilience initiatives in water, livestock, enterprise development, and groundwater management. Overall, investments are delivered through four main pathways: strengthening research and extension systems; improving water availability and rangeland management; integrating production systems with domestic and regional markets; and establishing enabling policy and institutional frameworks to support long-term food systems resilience in Somalia.

The Project is supporting the construction of a Livestock Market in Dhobley, Afmadow District to improve pastoralists’ and livestock traders’ access to organized and reliable market infrastructure. The facility is intended to enhance livestock aggregation and trade, improve animal health inspection and handling conditions, reduce transaction inefficiencies, and stimulate local economic growth and livelihood opportunities.

The livestock market will establish a structured, safe, and hygienic trading environment for herders, traders, transporters, and buyers, thereby contributing to increased incomes, strengthened food security, and enhanced community resilience.

Preparation of this Environmental and Social Management Plan (ESMP) ensures that the construction and operation of the livestock market are designed and implemented in a way that prevents, minimizes, and mitigates potential environmental and social risks and impacts. The ESMP also ensures compliance with applicable Federal and State regulations, as well as the relevant Environmental and Social Standards (ESS) of the World Bank.

Figure 1: Results Chain for Dhobley Livestock Market Subproject

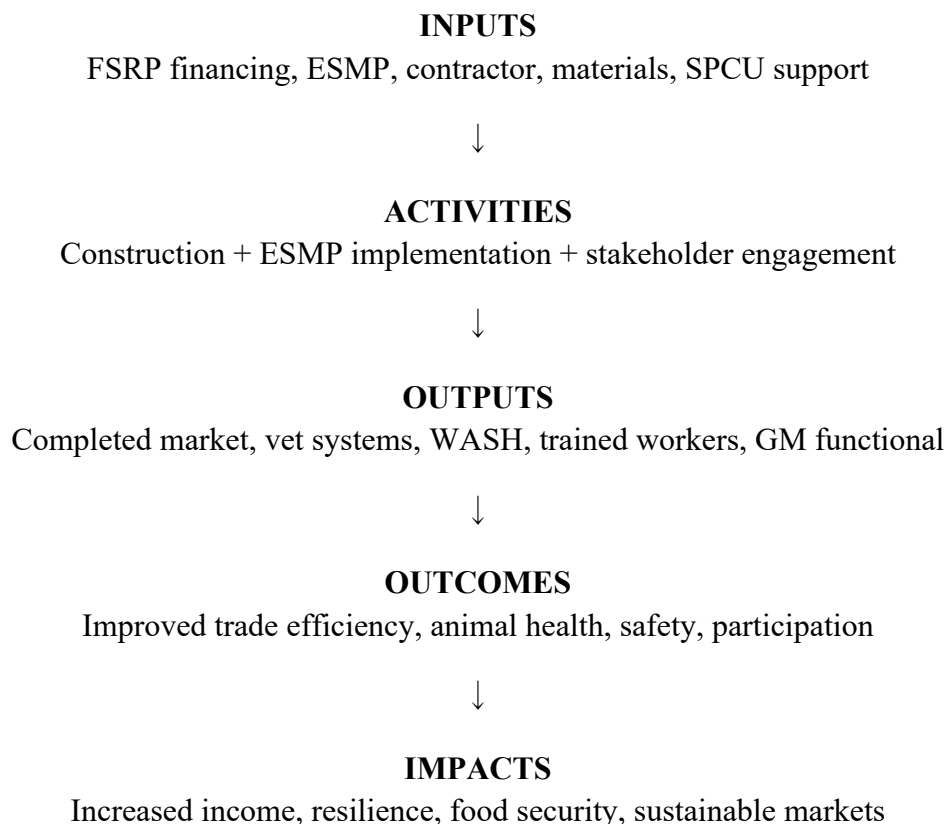


Table 1: ESMP Monitoring & Evaluation (M&E) Mini-Matrix

Level	Inputs / Activities	Outputs	Outcome Indicators	Data Source	Frequency
Input	Project funds disbursed; contractor mobilized; ESMP approved	Resources available and works initiated	% of planned budget disbursed; Contractor mobilization completed on time	Project financial reports; SPCU records	Quarterly
Activity	Construction of infrastructure; ESMP implementation (ESHS, OHS, GBV/SEA/SH, GM)	Infrastructure constructed; safeguards implemented	% of works completed vs plan; Number of ESHS trainings; GM operational	Contractor reports; supervision reports; GM records	Monthly

Output	Completed holding pens, auction yards, vet areas, WASH and waste systems	Operational livestock market facilities	Number of functional facilities; ESMP compliance level	Site inspections; engineer certifications	Monthly / Quarterly
Outcome	Improved livestock trading conditions and services	Increased efficiency, safety, and access	% increase in livestock traded; reduced disease cases; fewer complaints	Market records; veterinary reports; GM database	Quarterly / Annually
Outcome	Enhanced livelihoods and local economy	Increased income and resilience	% increase in income; user satisfaction levels	Surveys; stakeholder consultations	Annually

1.2 Purpose of the ESMP

In line with the Project's Environmental and Social Management Framework (ESMF), this Environmental and Social Management Plan (ESMP) has been prepared for the proposed Livestock Market Construction in Dhobley District. The purpose of the ESMP is to define site-specific measures to avoid, minimize, and manage potential environmental and social risks and impacts associated with the construction and operation of the livestock market.

The ESMP is aligned with applicable Federal and State legal and institutional frameworks, the World Bank Environmental and Social Framework (ESF) and its Environmental and Social Standards (ESSs), the World Bank Group Environmental, Health and Safety Guidelines (EHSs), and Good International Industry Practice (GIIP). Implementation of the subproject will primarily adhere to the requirements of the World Bank ESF and relevant EHSs, as these constitute the most stringent applicable standards.

The ESMP identifies potential environmental and social risks related to livestock market construction and operations such as waste management, occupational health and safety, community safety, and animal health considerations and outlines corresponding mitigation, monitoring, capacity-building, and reporting measures. It serves as a practical management tool for the Contractor, Supervising Engineer, and the State Project Coordination Unit (SPCU) to ensure effective environmental and social risk management. The ESMP is a living document and will be periodically reviewed and updated throughout the subproject cycle, informed by regular Environmental and Social monitoring and annual audits.

1.3 Methodology

The ESMP for the Livestock Market was prepared through a combination of stakeholder consultations, field site assessments, and review of relevant technical and design documents. Reference materials included the World Bank Environmental and Social Framework (ESF) and associated Environmental and Social Standards (ESSs), applicable Environmental, Health and Safety Guidelines (EHSs), relevant Federal and State laws and regulations, and applicable international conventions and best practices.

Stakeholder consultations were conducted on 25 September 2025 with representatives from district authorities, livestock traders, veterinary officers, community leaders, women and youth groups, and other relevant institutions. The consultations also included vulnerable and potentially marginalized groups, such as smallholder pastoralists, small-scale livestock traders, women-headed households, and youth engaged in livestock value chains, to ensure inclusive participation and representation of diverse community interests.

The consultations aimed to gather views on baseline environmental and social conditions, identify potential risks and impacts related to livestock market activities, discuss mitigation measures, and review grievance handling mechanisms. Particular attention was given to the needs and constraints of vulnerable groups, including access to market facilities, affordability, safety, and equitable participation in livestock trading activities.

Participants provided constructive feedback and recommendations to strengthen environmental management, community safety, animal health controls, and operational sustainability of the livestock market. Key issues raised and corresponding response measures are summarized in Annexes (5–7). The finalized ESMP will be disclosed at the national and state levels and implemented throughout the construction and operational phases of the livestock market subproject.

1.3.1. Construction and Resource Management Approach

In addition to the methodology described above, the ESMP incorporates key construction planning and resource management considerations to inform the identification of environmental and social risks and the development of appropriate mitigation measures. The construction of the proposed livestock market in Dhobley will be implemented in phases, including site preparation, civil works, installation of market infrastructure, and finalization works. The Contractor is expected to mobilize a workforce that will gradually increase during peak construction and decrease during demobilization. The workforce will consist of both skilled and unskilled labor, with preference given to local employment where feasible to minimize labor influx.

Labour inflow is anticipated to be limited and manageable. However, where external workers are required, the Contractor will provide appropriate accommodation in line with Environmental, Social, Health and Safety (ESHS) standards. Worker facilities will include adequate water supply, sanitation, waste management systems, and hygiene controls. If temporary worker camps are established, they will be properly sited and managed to avoid adverse impacts on surrounding communities and the environment.

Construction activities will involve transportation of materials, equipment, and infrastructure components to and from the site. A Traffic Management approach will therefore be implemented to address potential risks associated with vehicle movement, particularly during peak construction periods and in areas where construction activities intersect with community access routes and livestock movement. Measures will include installation of signage, speed controls, and coordination of delivery schedules to enhance safety.

Estimated resource requirements during construction have been considered as part of the ESMP preparation. Water demand during peak construction is expected to range between 5–10 m³ per day, while fuel consumption is estimated at approximately 50–100 liters per day, depending on construction intensity. Water will be sourced from approved local suppliers or existing water points with authorization from relevant authorities, ensuring no adverse impact on community access or local resources. Fuel will be procured from licensed suppliers and stored in designated areas with appropriate safety measures.

To ensure effective environmental and social risk management, the Contractor will develop and implement a set of site-specific sub-management plans as part of the Contractor's ESMP (C-ESMP). These will include a Waste Management Plan (WMP) and a Spill Prevention and Response Plan, which will guide proper waste handling and the safe storage and management of fuels and other hazardous materials. These plans will be reviewed and approved by the Supervising Engineer and the State Project Coordination Unit (SPCU) prior to commencement of construction activities.

1.4 Sub-project Description

This ESMP has been prepared for the construction of a new Livestock Market in Dhobley District. The subproject seeks to establish an organized and accessible livestock trading facility that supports pastoralists, livestock traders, and buyers through improved market infrastructure. It aims to facilitate efficient livestock aggregation and marketing, improve animal handling and inspection systems, and strengthen the local livestock value chain.

The proposed Livestock Market will include essential facilities such as livestock holding pens, auction yards, loading and offloading ramps, veterinary inspection areas, water supply points, sanitation facilities, drainage systems, and designated spaces for traders and customers. These facilities are designed to improve market organization, enhance hygiene and animal health standards, ensure safer trading conditions, and expand income-generating opportunities for livestock-dependent communities. A clear understanding of the intended functions of these facilities is critical for assessing potential environmental and social impacts during both construction and operational phases.

The construction site is situated within Dhobley area, Afmadow District, with land ownership and administrative jurisdiction confirmed by the relevant district authorities and the Ministry of Livestock, Forestry and Range (MoLFR).

Location of the site. 0°23'17.0" N 41°00'01.9" E



Figure 2: Google Earth Map Indicating the Location of the Livestock Market in Dhobley

The project site is in Dhobley, Afmadow District, a strategic commercial town near the Kenya–Somalia border that serves as an important cross-border livestock trading center. Security in the area is maintained by Jubbaland State security forces, and the district has access to basic public services such as health, education, and local administrative institutions.

The local community mainly depends on livestock production, livestock trade, and small-scale commerce for their livelihoods. The district functions as a key livestock aggregation and transit point for animals sourced from surrounding pastoral areas.

The Livestock Market will be constructed on land identified by local authorities and selected based on accessibility, road connectivity, drainage suitability, and proximity to livestock producers and traders, while maintaining appropriate separation from residential settlements. The land is government-owned and has been formally authorized by local authorities for public use, specifically for the development of the livestock market.

Project Components/Activities: The project involves the construction of a new Livestock market building. Based on the Bill of Quantities (BoQ), key activities include (BoQ, Designs, etc), see Annex 1 for design layout:

The proposed livestock market will be developed on an undeveloped and vacant land parcel measuring approximately **100×130m**. The substructure phase will involve limited site preparation activities, including minor clearing, leveling, and light earthworks confined to the project footprint, as the site has not been previously used for construction purposes. Excavation will be undertaken for foundations, and a raised foundation/plinth level will be constructed to reduce the risk of flooding and water ingress, using properly compacted fill and reinforced concrete in accordance

with approved structural designs. Concrete flooring and properly compacted fill will be used in accordance with approved structural designs. A designated waste management area will be established within the site to manage animal waste and wash water in an environmentally sound manner. All substructure activities will be implemented with appropriate drainage, soil stabilization, and occupational health and safety measures, in full compliance with the World Bank Environmental and Social Framework (ESF) and applicable national regulations.

- **Substructure:** The substructure phase of the livestock market involves constructing all foundational and supporting elements that provide stability for the permanent facilities on the project site. This includes reinforced concrete strip and isolated footings to support animal sheds for camels, cattle, goats, and sheep, the administration and veterinary blocks, traders' area, toilet units, fodder storage facility, waste management area, and quarantine area. Concrete plinths and ground beams will be constructed to evenly distribute structural loads, while the site will undergo careful excavation, compaction, and leveling to provide a firm and durable base. Subsoil drains and damp-proof membranes will be installed to prevent water ingress and flooding, ensuring hygienic conditions and long-term structural integrity. All works will be carried out using reinforced concrete, cement, and masonry materials, following standardized engineering designs to guarantee durability, functional efficiency, and compliance with occupational health and safety standards.
- **Superstructure:** The superstructure phase of the livestock market will involve the construction of permanent facilities within the project site, including separate animal sheds for camels, cattle, goats, and sheep, an administration block, a veterinary block, a traders' area, toilet units, a fodder storage facility, a designated waste management area, and a quarantine area. The animal sheds will be constructed using galvanized steel, while all other structures will be built with concrete block masonry, timber framing, reinforced concrete, and corrugated iron roofing sheets, in accordance with standardized architectural and structural designs. Specific provisions for animal waste management will be incorporated into the design, including designated manure collection points within animal holding areas, paved and well-drained surfaces to facilitate cleaning, and drainage channels to direct liquid waste to appropriate disposal or treatment areas. A centralized waste management area will be established for the temporary storage and handling of manure and other organic waste prior to safe disposal or reuse (e.g., composting where feasible). Raised plinths and proper drainage will be incorporated throughout the site to ensure protection against flooding, hygienic conditions, and operational efficiency. The design and construction of all facilities will prioritize structural integrity, durability, functional efficiency, and compliance with occupational health and safety requirements, as well as good environmental and sanitation practices.

- **Walling & Finishes:** The walls of all structures will be constructed using concrete blocks with cement mortar. Interior walls will be plastered and finished with cement-sand rendered, while exterior walls will be rendered and painted to provide durability and protection against weathering. Window and door openings will be fitted with timber or metal frames, and all finishes will conform to State and national building standards to ensure safety, longevity, and ease of maintenance.
- **Location:** The Livestock market site is located at coordinates 0°23'17.0" N 41°00'01.9" E , within the Dhobley area of Afmadow District.
- **Timeline & Workforce:** The expected construction duration is 3-4 months. The project will employ both skilled (Masons, carpenters, steel benders, and plumbers) and unskilled local labour with an- affirmative action for both vulnerable and minority job seekers. Furthermore, qualified engineers and environmental specialists will be engaged to uphold the contractual standards and requirements. The total workforce is estimated at around 150 individuals. In Somalia, the official working hours are eight per day, typically from 8:00 a.m. to 5:00 p.m., with scheduled breaks included.
- **Materials & Machinery:** Materials include ready-mix concrete from a local plant, reinforcement steel, cement, aggregates, blocks, tiles, paint, PVC, and wood. Borrow materials (sand, aggregate) will be sourced from government-designated quarries in the site near area. Machinery will include trucks, compactors, and concrete vibrators. The construction site is near a borehole which supplies water for construction. During construction, the contractor will be assigned a dedicated water source with a meter gauge, while also providing temporary, clean, and segregated sanitation facilities such as portable toilets. Energy requirements for generators and machinery will be met through fuel purchased from licensed dealers in Dhobley. The contractor will implement a Waste Management Plan (WMP), which includes segregating waste into labeled bins (general and hazardous), storing hazardous materials such as fuel, oil, and paint in a secure bunded area, and disposing of all waste at government-approved sites.
- **Access:** The site is accessible from the main Dhobley Road. The contractor will be required to schedule material deliveries during off-peak hours to minimize disruption.

1.6 Sub Project Alternatives

In accordance with the World Bank Environmental and Social Framework (ESF), an analysis of feasible alternatives was undertaken to ensure that the selected location, design, and implementation approach for the proposed Livestock Market in Dhobley represents the most appropriate option from environmental, social, technical, and economic perspectives. The assessment considered the “No Project” option, alternative site locations, design and layout options, construction materials, and operational management approaches.

a) No Project Alternative

Under the “No Project” scenario, the livestock market would not be constructed, and livestock trading in Dhobley would continue under existing informal and unstructured conditions. This would likely result in continued poor sanitation, lack of organized animal handling and veterinary inspection, increased risk of disease transmission, and inefficiencies in livestock aggregation and marketing. In addition, opportunities to improve livelihoods, enhance market access, and stimulate local economic growth would be foregone.

Conclusion: This option is not preferred as it fails to address existing environmental, social, and economic challenges.

b) Alternative Site Locations

Alternative sites within Dhobley and its surrounding areas were assessed based on key selection criteria, including land ownership status, accessibility, proximity to livestock producers and traders, drainage conditions, and distance from residential settlements. The selected site was identified as the most suitable option as it is government-owned land that has been formally authorized for public use, thereby eliminating the need for land acquisition and avoiding physical or economic displacement in line with ESS5 requirements. In addition, the site has good access to main roads and established livestock movement corridors, which supports efficient livestock aggregation and trade. Its location at a reasonable distance from residential areas minimizes potential nuisance impacts such as noise, odor, and traffic-related risks, consistent with ESS4 on community health and safety. The site also exhibits suitable topography and natural drainage characteristics, reducing the risk of flooding and associated environmental impacts, in line with ESS1 and ESS3. Other potential sites were not selected due to constraints such as unclear land tenure, limited accessibility, proximity to residential settlements, or unsuitable environmental conditions.

c) Design and Layout Alternatives

Alternative design and layout options were evaluated to ensure optimal functionality, environmental performance, and operational safety of the livestock market. The selected design incorporates species-specific animal holding areas to minimize stress and reduce the risk of disease transmission, as well as dedicated veterinary inspection and quarantine facilities to strengthen animal health management. Integrated drainage and sanitation systems have been included to maintain hygienic conditions and prevent environmental contamination. In addition, the design provides for a designated waste management area with manure collection systems to support the proper handling, storage, and disposal or reuse of animal waste. Raised plinth levels have also been incorporated to mitigate flood risks and enhance the durability and resilience of the infrastructure. Simplified or non-

engineered design alternatives lacking adequate drainage, waste management, and animal segregation features were not considered suitable due to their higher environmental, public health, and operational risks.

d) Construction Materials and Technology Alternatives

Alternative construction materials and technologies were considered based on durability, cost-effectiveness, local availability, and environmental implications. The selected approach utilizes galvanized steel structures for animal sheds due to their durability, resistance to corrosion, and low maintenance requirements. Permanent buildings such as the administration and veterinary blocks will be constructed using concrete block masonry and reinforced concrete to ensure structural stability and longevity. Where feasible, locally available materials will be used to reduce transportation-related environmental impacts and support the local economy. Temporary or lower-quality construction alternatives were not considered appropriate, as they would result in reduced lifespan, higher maintenance costs, and potential safety concerns, making them less sustainable over the long term.

e) Operational and Environmental Management Alternatives

Alternative approaches to site operation and environmental management were examined, particularly in relation to waste handling, water use, and overall site hygiene. The selected approach includes a structured animal waste management system that provides for the collection, temporary storage, and safe disposal or reuse of manure and organic waste, including composting where feasible. Controlled water use and well-designed drainage systems will be implemented to prevent water stagnation, minimize contamination risks, and maintain sanitary conditions within the market. In addition, the implementation of the ESMP will be supported by site-specific sub-management plans, including a Waste Management Plan (WMP) and a Spill Prevention and Response Plan, which will guide the safe handling of waste and hazardous materials. Informal or uncontrolled waste management practices were rejected due to their potential to cause environmental pollution, increase public health risks, and result in non-compliance with ESS3 and ESS4 requirements.

2. Environmental and Social Baseline Description

2.1. Environmental Baseline

The subproject will be implemented in a semi-urban setting within Dhobley District. The proposed Livestock Market construction site is located within a designated settlement area on an already clear, open, and level public land area intended for infrastructure development. The site does not require vegetation clearing, tree cutting, or disturbance of natural habitats, as it is free from significant plant cover.

Living Environment (Flora and Fauna)-The project area has very limited natural vegetation and is primarily an open settlement space. There are no trees, protected plant species, or ecological habitats that require removal or conservation measures. Wildlife presence is minimal and mostly limited to common birds and domestic animals due to the semi-urban character of the location. No endangered species, protected ecosystems, or environmentally sensitive habitats have been identified within or near the project footprint. Overall, the site does not contain ecologically significant biodiversity resources, and the project is not expected to cause habitat degradation or biodiversity loss.

Physical Environment-The terrain of the site is flat and structurally stable, making it suitable for livestock market infrastructure development. The soil composition is mainly sandy loam, which provides reasonable ground stability for construction activities. Since the land is already cleared and not used for farming, no agricultural land conversion or vegetation disturbance will occur. The site is not located near rivers, streams, wetlands, or other permanent surface water bodies. Water supply in Dhobley, Afmadow District, is mainly obtained from groundwater sources such as boreholes and shallow wells, supplemented by seasonal rainfall. The district experiences a semi-arid climate characterized by two rainy seasons (Gu and Deyr), with average annual rainfall ranging from approximately 250–450 mm and temperatures between 25–35°C. The area is generally susceptible to drought conditions.

2.2 Social Baseline

The subproject will be implemented in Dhobley, which is characterized by a mixed urban and peri-urban population supported by surrounding rural communities. The district functions as a key commercial and cross-border trading center, with local livelihoods largely dependent on livestock production, crop farming, and small-scale trade. Economic activities are strongly influenced by seasonal rainfall variability, livestock migration patterns, and market accessibility.

In terms of social services, Dhobley has limited but functional basic infrastructure. Access to health services is provided through primary health facilities and clinics, although capacity and coverage remain constrained. Educational facilities, including primary and secondary schools, are present but may face challenges related to access, resources, and enrollment, particularly for vulnerable groups.

Access to electricity is limited and largely dependent on private generators and small-scale solar systems, with no widespread grid coverage. Water supply is mainly sourced from shallow wells and boreholes, which are critical for both domestic use and livestock, especially during dry seasons. The road network consists primarily of unpaved roads and tracks, which facilitate movement of people, goods, and livestock but can become difficult to use during adverse weather conditions.

The establishment of the Livestock Market is expected to strengthen local trade systems, improve market organization, and enhance income opportunities for pastoralists and traders.

Livelihoods-Households in Dhobley and surrounding areas primarily depend on livestock production, trade, and subsistence agriculture for income and food security. Livestock species commonly kept include cattle, goats, sheep, camels, and poultry. In addition to livestock activities, community members engage in petty trading, cross-border commerce, transport services, casual labour, and remittance-supported livelihoods. Women and youth are actively involved in small-

scale trading and market-related activities but may face constraints related to access to finance, business services, and productive assets. Livelihoods in the district remain vulnerable to climate variability, particularly drought and fluctuations in commodity and livestock prices.

Governance and Administration- The project area is administered under the Jubbaland State local governance framework. Dhobley district does not operate under a mayoral system; instead, it is governed by district authorities led by a District Commissioner, supported by a Deputy District Commissioner, District Secretary, and Finance Manager, all of whom are appointed by the Jubbaland State President. These officials are responsible for overseeing local administration, coordination of services, security, and development activities. The district does not have a formal municipal council or elected assembly representing villages; however, governance functions are carried out through continuous coordination between district authorities and community representatives. Traditional leadership structures, including clan elders, religious leaders, and other respected community figures, play a central role in local governance and are actively involved in decision-making processes related to land use, dispute resolution, and community development. In practice, formal and traditional systems operate in a complementary manner, where district authorities provide administrative oversight and official approvals, while traditional leaders facilitate community engagement, consensus-building, and conflict resolution. Decisions on development activities are typically reached through consultative processes that involve both structures to ensure local acceptance and legitimacy. Representation of vulnerable groups, including women, youth, minority clans, and internally displaced persons (IDPs), remains limited within formal governance structures, as leadership positions are predominantly held by men, while within traditional systems participation of these groups is often indirect and mediated through clan-based representation, with limited influence on final decision-making. To address these gaps, the project will promote inclusive stakeholder engagement by ensuring meaningful participation of women, youth, and vulnerable groups in consultations and decision-making processes, and by providing accessible channels through the project Grievance Mechanism (GM) to enable all community members to raise concerns and provide feedback.

Gender and Gender-Based Violence (GBV)- Gender-based violence (GBV) risks exist within the local context, particularly in relation to women's participation in public trading spaces such as the livestock market, where interaction with predominantly male traders may expose women and girls to risks of harassment, discrimination, or exclusion. Similar risks may also be present in other public spaces, including schools, health facilities, and government service areas, where women and girls may face barriers to access, social stigma, or unequal treatment, especially in contexts with limited gender-sensitive infrastructure and oversight. Although the overall GBV risk in the project area is assessed as low to moderate, these risks are compounded by the limited availability of GBV response services in the district, which may constrain timely support for survivors.

To address these risks, the project will implement gender-sensitive measures, including promoting safe and inclusive design of market facilities (e.g., adequate lighting, clear visibility, and separate sanitation facilities), enhancing the participation of women and youth traders, and conducting GBV awareness and prevention activities targeting workers and the community. The project will enforce Codes of Conduct (CoC) for contractors and workers to prevent sexual exploitation and abuse (SEA) and sexual harassment (SH) and will strengthen the Grievance Mechanism (GM) to ensure it is confidential, accessible, and responsive to GBV-related complaints, with appropriate referral

pathways where services are available. These measures will also contribute to improving safety and inclusion in other public spaces by promoting broader awareness and accountability within the community.

Community Composition and Vulnerable Groups-The community is generally socially cohesive but includes diverse groups due to trade migration across the border region. Vulnerable populations include female-headed households, internally displaced persons (IDPs), persons with disabilities, and economically disadvantaged families who may face barriers to land access, employment, and market participation. The project will promote inclusive access to market facilities and encourage equitable participation in market activities.

Access to Water and Energy-Water supply in Dhobley is mainly obtained from boreholes, shallow wells, and private water vendors, with reduced availability during dry seasons. Electricity access remains limited, with most households and businesses relying on solar energy systems and privately operated generators. The market design will consider sustainable and locally appropriate water and energy solutions.

Waste Management-Solid waste management services in the district are limited, and open dumping or uncontrolled burning of waste is commonly practiced. Poor waste management may lead to environmental pollution and public health risks. During construction and operation of the livestock market, proper waste handling systems will be implemented, including designated waste collection points, coordination with local authorities for approved disposal methods, and awareness programs for market users on environmental hygiene.

Cultural Heritage-No officially recognized cultural heritage or archaeological sites are located within the proposed market construction area. The site is situated within an already developed settlement zone. However, a Chance Find Procedure will be included in the ESMP to manage any unexpected discovery of cultural or historical artifacts during excavation activities.

Security Context-The security situation in Dhobley has improved due to the presence of state security forces, although occasional risks associated with cross-border movement and regional instability may occur. The market construction site may attract public gatherings and trading activities, requiring close coordination with local security authorities. Contractors will be responsible for securing the construction site, equipment, and workforce, and must implement controlled site access, routine safety measures, and compliance with local security guidance throughout the project period.

3. Legal and Regulatory Framework

This chapter outlines the key policies, legal, regulatory, and institutional requirements relevant to the implementation of the subproject activities. It also incorporates applicable provisions of the Environmental and Social Framework (ESF), Environmental, Health and Safety Guidelines (EHSGs), and Good International Industry Practice (GIIP) as required by the World Bank. The chapter further presents a gap analysis between national legislation and World Bank standards and highlights international conventions and treaties ratified by Somalia. The subproject will be implemented in compliance with national and state-level regulations as well as applicable World Bank environmental and social standards.

3.1. Somalia national laws, policies, and legislations

3.1.1 The Federal Republic of Somalia Provisional Constitution, 2012:

The overarching legal document is the Provisional Federal Constitution, which was adopted on August 1, 2012. There are several provisions that are relevant for this project as summarized below.

- I. **Article 24 – Labour Relations:** Every individual is entitled to fair labour relations, including the right to strike, to form and join trade unions, to participate in union activities, and to engage in collective bargaining on labour-related matters. All workers, especially women, have the right to special protection from sexual abuse, segregation, and discrimination in the workplace. All labour laws and practices must uphold and promote gender equality at work.
 - II. **Article 25 – Environment:** This article affirms that every Somali has the right to a healthy environment that does not harm their health or wellbeing, and to protection from pollution and hazardous materials. It also states that every Somali has the right to benefit from the country’s natural resources while being safeguarded against excessive and destructive exploitation of those resources.
 - III. **Article 43 – Land:** Land is recognized as a primary resource and the foundation of people’s livelihoods. It must be owned, utilized, and managed in a fair, efficient, productive, and sustainable manner. The Federal Government of Somalia (FGS) is responsible for developing a national land policy subject to ongoing review. No permit may be issued for the permanent use of any part of the land, sea, or air within the territory of the Federal Republic of Somalia. The FGS, in consultation with the Federal Member States (FMS) and other stakeholders, shall regulate land policy, as well as land control and land-use measures.
 - IV. **Article 45 – Environment:** This article provides that the Government shall prioritize the protection, conservation, and preservation of the environment against activities that may harm biodiversity and ecosystems. All citizens also have a responsibility to protect and improve the environment and to participate in the development, implementation, management, conservation, and protection of natural resources and the environment. The FGS, together with the governments of the affected FMS, shall take urgent actions to clean up hazardous waste dumped on land or in waters within the country, address desertification, deforestation, and environmental degradation, and implement measures to conserve the environment and prevent activities that damage the nation’s natural resources.
- 3.1.2. Policy, Legal and Institutional Frameworks.** The project is required to comply with laws of Somalia relevant to the project, including the National and State Environment Policy and the newly developed Federal legislation, the Environmental Protection and Management Act that became effective as of February 24, 2024. Development partners are supporting the country in the preparation of subsidiary Environmental and Social Impact Regulations that would give effect to the Act.

- 3.1.3. National Environment Policy-** Both State and Somali national Cabinet, on February 13, 2020, approved State and National Environmental Policy, the overall goal of the policy is to improve and enhance the health and quality of life of the Somali people and to promote sustainable development through sound management of the natural resources of the country. The specific objectives of this policy are Conservation of Natural Resources, Environmental Governance, and Multi-stakeholder Partnerships.
- 3.1.4. Somalia National Gender Policy (2016)** includes strategies to eradicate harmful traditional practices such as female genital mutilation/cutting (FGM/C) and child marriage and to improve services for the management of GBV/SEAH cases.
- 3.1.5. Somalia Solid Waste Management Framework.** In Kismayo, the local government or City Administration collects, transports and disposes waste materials from the city, and the waste is disposed of at Qashinweyne outside the town in Gobweyn dumpsites. This is done to minimize harm to individual health as well as the environment. In Somalia there is no distinction of the nature of waste; whether solid, liquid or any other form; waste will be considered as waste and dumped in the dumping sites
- 3.1.6. Somalia Labour Code (Law No. 36 of 2024):** The new Somalia Labour Code modernizes labour regulation and replaces the Labour Code of 1972. The law governs employment relationships, workers' rights, and working conditions. It requires that employment contracts clearly specify a) the nature and duration of the contract; b) the working hours and place of work; c) the remuneration or wages payable to the worker; and d) procedures for suspension or termination of employment. The law also strengthens protections against discrimination, forced labour, child labour, and workplace harassment. Regarding occupational health and safety (OHS), employers are required to provide safe and healthy working conditions by implementing appropriate measures to protect workers from occupational hazards, including maintaining safe workplaces, providing sanitation facilities, clean drinking water, and necessary safety equipment to safeguard workers' health and safety
- 3.1.7. Environmental Protection and Management Act, 2024:** The act guarantees the right to a clean, safe and healthy environment, provides requirements for waste management including hazardous wastes. The act requires the application of polluter pay and precautionary principles in environment management. The demolition and construction project is required to adhere to all the relevant requirements prescribed by the act.

3.2. Jubbaland State laws, policies, and legislations

3.2.1 Jubbaland State Constitution (2015)

The Jubbaland State Constitution (2015) provides the legal framework for governance, protection of human rights, management of natural resources, and environmental conservation within the

Jubbaland State of Somalia. Several provisions are relevant to environmental and social safeguards and are summarized below.

- I. Article 3 – Fundamental Principles:** This article establishes the foundational principles of governance in Jubbaland, including respect for human rights, equality, justice, and the rule of law. It promotes inclusive governance and ensures that all citizens participate in public affairs without discrimination. These principles support social security by promoting fairness, participation, and protection of vulnerable groups in development processes.
- II. Article 24 – Duties of Citizens:** This article states that every citizen has a responsibility to protect the environment, respect the laws of the state, and contribute to the welfare of society. It emphasizes the collective responsibility of citizens to safeguard natural resources and promote sustainable environmental management.
- III. Article 80 – Human Rights Commission:** This article establishes an independent Human Rights Commission responsible for promoting and protecting human rights in Jubbaland. The commission investigates human rights violations, protects vulnerable groups, and ensures that government actions and development activities respect fundamental rights and freedoms.
- IV. Article 82 – Land and Property Commission:** This article provides for the establishment of a Land and Property Commission responsible for addressing land disputes, regulating land use, and ensuring equitable access to land resources. The commission plays a critical role in preventing land conflicts and ensuring fair land allocation, particularly in the context of development projects and resettlement.
- V. Article 92 – Natural Resources and Cooperation with the Federal Government:** This article outlines cooperation between Jubbaland and the Federal Government of Somalia in the management of natural resources, environmental protection, and sustainable development. It ensures coordinated management of resources such as land, water, forests, and wildlife, while promoting conservation and responsible utilization of natural resources.
- VI. Article 72 – Emergency Powers:** This article authorizes the Jubbaland government to take emergency measures in response to disasters or crises, including environmental emergencies such as floods, droughts, and other natural hazards. These provisions support disaster preparedness and response mechanisms to protect communities and the environment.

3.2.2. Jubbaland State Legal and Institutional Framework for Environmental and Social Safeguards

Jubbaland State, as a Federal Member State of Somalia, implements environmental and social safeguard measures within the framework of federal laws and policies together with the Jubbaland

State Constitution (2015) and relevant sector institutions. Environmental protection, natural resource management, land governance, and social protection are therefore guided by both federal legislation and state-level administrative structures. At the state level, the Jubbaland Ministry of Environment and Climate Change is responsible for environmental protection, environmental monitoring, and coordination of environmental management activities. The ministry oversees issues related to environmental conservation, climate change, pollution control, and sustainable management of natural resources.

Other sector institutions also contribute to environmental and social safeguards. The Ministry of Agriculture and Irrigation, Ministry of Livestock, Forestry and Range, and the Ministry of Fisheries and Marine Resources regulate the sustainable use of agricultural land, livestock resources, rangelands, and marine resources. Land administration and land dispute resolution are handled by relevant state authorities and local administrations responsible for land management and land use regulations. These institutions support equitable land access and help address land-related conflicts that may arise from development activities. At the municipal level, local authorities, particularly in urban centers such as Kismayo, are responsible for waste management, sanitation, and environmental health services. Municipal administrations coordinate waste collection, transportation, and disposal to reduce environmental pollution and protect public health.

These institutions work in coordination with federal agencies, development partners, and local communities to ensure that development projects comply with environmental and social safeguard requirements, including environmental assessments, community consultations, and sustainable natural resource management.

3.3. The World Bank Framework

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

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

World Bank Environmental and Social Framework (ESF): The following Environmental and Social Standards (ESSs) are relevant to this project:

ESS1 – Assessment and Management of Environmental and Social Risks and Impacts: This standard is fundamental for all project activities, requiring, where necessary, Environmental and Social Management Plans (ESMPs) to manage potential risks. For the construction of the

Livestock Market, ESS1 necessitates an ESMP specifically addressing issues like dust, waste management, and community health and safety during construction.

ESS2 – Labour and Working Conditions: This standard ensures safe and fair labour practices, including working conditions, worker health and safety, and a separate grievance mechanism (GM) for workers. The construction of the Livestock Market in Dhobley requires strict adherence to ESS2 to protect workers from hazards like heavy equipment use and potential exposure to dust or other harmful substances.

ESS3 – Resource Efficiency and Pollution Prevention and Management: ESS3 is relevant to managing pollution and ensuring resource efficiency. For the Ministry site, it applies to managing dust, noise, and waste during construction, ensuring minimal environmental impact, and applying best practices in resource usage during construction.

ESS4 – Community Health and Safety: Focused on protecting the health and safety of nearby communities, ESS4 is critical for the FFS sub-project to mitigate potential risks from dust, debris, noise, hazardous material exposure, traffic accidents, and potential issues due to labor influx, including sexual exploitation, abuse, and harassment (SEAH). Measures include fencing, safety signage, controlled traffic access and safety measures, prevention of SEAH through raising awareness among the workers and use of workers' code of conduct, and respective communication with residents about safety precautions.

ESS5 of the World Bank Environmental and Social Framework addresses land acquisition, restrictions on land use, and involuntary resettlement, and requires that projects avoid or minimize involuntary resettlement and ensures that any land acquisition is conducted through transparent and voluntary processes.

In line with ESS5 requirements, the land for the Dhobley livestock market construction site is government-owned land located within the livestock market area in Dhobley and was formally authorized for public use by the District Commissioner.

Prior to the authorization, a three-day community consultation process was conducted to present the proposed development, explain the purpose of constructing the livestock market, and gather community views and consent. The consultations involved village elders, community members, livestock traders, and local leaders, ensuring transparency and confirming that the land would be used for the benefit of the wider community.

Following the consultations, a two-day site assessment was undertaken by the project technical team to verify the suitability of the proposed location. The assessment included environmental and social screening, verification of the land status as government property, and confirmation that the site was free from disputes and would not result in any displacement or loss of assets or livelihoods.

The District Commissioner formally authorized the use of the land for public purposes, specifically for the construction of the livestock market to support livestock trade and local economic

development. As the land is government-owned and no households, assets, or livelihoods were affected, no involuntary resettlement occurred. Documentation confirming the land authorization and consultation process is attached to Annex 8.

ESS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources: ESS6 emphasizes the protection and sustainable management of biodiversity and living natural resources. For the Livestock market construction in Dhobley, this involves screening the project site to identify any nearby natural habitats or ecological features, avoiding or minimizing disturbance to vegetation and wildlife, ensuring proper management of construction waste and materials to prevent environmental contamination, and promoting sustainable use of natural resources during implementation.

ESS8 – Cultural Heritage: ESS8 seeks to protect tangible and intangible cultural heritage. ESS8 may be relevant to this sub-project if there is a chance to find during excavation works.

ESS10 – Stakeholder Engagement and Information Disclosure: ESS10 emphasizes the need for ongoing community engagement and information dissemination. For the FFS sub-project, this involves informing stakeholders about construction timelines, risks and potential negative impacts, and benefits and establishing a grievance mechanism to address concerns.

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

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

3.4. Gap Analysis between National/Municipal Laws and World Bank ESS

Although Somalia has established constitutional provisions, environmental policies, and sectoral laws relevant to environmental protection, labour rights, land management, and social protection, there are still gaps when compared with the comprehensive requirements of the World Bank Environmental and Social Framework (ESF). The following summarizes the key gaps and the measures adopted by the project to address them.

Table 2: Gap Analysis

ESS Standard	Relevant Somali / Jubbaland Laws and Policies	Key Gaps Identified	Project Measures to Address Gaps
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Provisional Constitution (Articles 25 & 45); Environmental Protection and Management Act 2024; National Environmental Policy (2020)	Environmental legislation is relatively new and implementation mechanisms such as EIA regulations and enforcement capacity remain limited.	The project will apply World Bank ESF procedures including environmental and social screening, preparation of ESMPs, and regular monitoring.
ESS2: Labour and Working Conditions	Article 24 of the Constitution; Somalia Labour Code (1972 and updated Labour Code 2024); Civil Service Law	Weak enforcement of labour standards, limited grievance mechanisms for workers, and limited OHS monitoring in practice.	The project will implement Labour Management Procedures (LMP), ensure written contracts, enforce OHS measures, prohibit child and forced labour, and establish a worker grievance mechanism.
ESS3: Resource Efficiency and Pollution Prevention and Management	Environmental Protection and Management Act (2024); Municipal waste management systems in Kismayo	Waste management systems remain basic and lack detailed regulatory standards for hazardous waste management and pollution control.	The project will implement waste management measures, proper disposal procedures, and pollution prevention practices consistent with ESS3.

ESS4: Community Health and Safety	Constitution Articles 25 and 45; National Environmental Policy; municipal health and sanitation responsibilities	Limited provisions for managing construction-related community health and safety risks, including traffic safety, emergency preparedness, and GBV/SEA/SH prevention and response	The project will Implement site safety controls, traffic management and emergency response plans; enforce worker Codes of Conduct; provide GBV/SEA/SH awareness training; establish confidential reporting and referral mechanisms; and conduct community sensitization on health, safety, and GBV/SEA/SH risks.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Constitution Article 43; Jubbaland Land and Property Commission (Article 82)	Somalia lacks detailed national legislation and procedures governing resettlement planning and compensation frameworks consistent with international standards.	The project follows ESS5 requirements including voluntary land donation procedures, documentation of land ownership, community consultation, and ensuring no involuntary resettlement occurs.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Constitution Articles 25 and 45; National Environmental Policy; sector ministries responsible for agriculture, livestock, and fisheries	Limited operational regulations and enforcement mechanisms for biodiversity conservation and ecosystem protection.	The project will avoid sensitive ecosystems and implement mitigation measures to minimize environmental impacts.
ESS10: Stakeholder Engagement and Information Disclosure	Constitutional provisions on participation and	No comprehensive national legislation requiring formal stakeholder engagement	The project will implement a Stakeholder Engagement Plan (SEP),

	governance; responsibilities of local administrations	plans and disclosure procedures for development projects.	conduct community consultations, and will use established hotline number 560, Emails and physical arrival to the SPCU office for the existing State grievance Mechanism Committee
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4. Environmental and Social Risks and Impacts – Overview

4.1 Positive Impacts of the Subproject

The agriculture and trade economy in Dhobley is highly exposed to climate variability, market constraints, and limited trading infrastructure, including drought impacts, unstable commodity prices, inadequate market facilities, and post-harvest losses. These challenges have affected pastoralist and trader incomes and reduced efficient access to organized livestock markets.

The construction of the Livestock Market is expected to generate substantial positive impacts by establishing a structured, safe, and accessible trading facility for pastoralists, livestock traders, and buyers. The market infrastructure will improve livestock aggregation, animal handling, and marketing efficiency, reduce transaction losses, enhance price transparency, and strengthen local and cross-border livestock trade.

Immediate positive impacts are expected during the construction phase and early operation of the market. These include temporary employment opportunities for local laborers, improved access to a designated and organized livestock trading space, increased movement of traders and buyers to the area, and stimulation of small businesses such as transport services, food vendors, and livestock-related services. The presence of proper sanitation facilities and organized market areas will also improve hygiene, safety, and general market management.

Long-term positive impacts will include sustained improvements in livestock trade efficiency, better price negotiation due to organized market systems, and increased income for pastoralist households and livestock traders. The market is expected to strengthen local economic development, enhance cross-border livestock trade with neighboring areas, and support the growth of related services such as veterinary care, feed supply, and transport services. In addition, improved market infrastructure and management will contribute to better environmental sanitation, reduced livestock stress during trading, and improved public health conditions.

Overall, the subproject is expected to support increased household incomes, improved market accessibility, strengthened local economic development, enhanced food security, and greater resilience to climate and market shocks among pastoralist and trading communities in the Dhobley area of Afmadow District.

4.2 Potential Negative Environmental and Social Risks and Impacts

Based on site inspections conducted by Environmental and Social specialists, stakeholder consultations held on 21–22 September 2025, and review of the Environmental and Social Standards (ESSs) under the Environmental and Social Framework (ESF) of the World Bank, as well as the parent Environmental and Social Management Framework (ESMF) of the Somalia Food Systems Resilience Project (S-FSRP), site-specific environmental and social risks associated with the Livestock Market construction in Dhobley have been identified. These risks mainly relate to construction activities, market operation processes, and community safety considerations.

The environmental and social risks associated with the Livestock Market construction in Dhobley are generally considered low to moderate and site-specific. The risks are mainly related to construction-phase disturbances, market operation activities, occupational and community health and safety, waste management, and pollution during both construction and operational phases. During operation, potential risks include improper disposal of livestock manure, wastewater, slaughter residues (where applicable), and solid waste, which may result in soil, surface water and groundwater contamination, odor nuisance, increased disease vectors, and public health concerns. The following table summarizes the key risks, impacts, and preliminary risk ratings.

4.2.1 Risk Assessment Methodology

Environmental and social risks associated with the proposed Livestock Market were assessed using a qualitative risk assessment approach based on the likelihood of occurrence and the severity of consequences. Each identified risk was assigned a score ranging from 1 (Very Low) to 5 (Very High) for both likelihood and consequence. The overall risk level was determined by multiplying the likelihood score by the consequence score (Risk Score = Likelihood × Consequence)

The resulting risk ratings were classified as follows:

Risk Score	Risk Rating
1-5	Low
6-12	Moderate
15-25	High

The assessment considered both the inherent risk (before mitigation) and the residual risk (after implementation of mitigation measures outlined in this ESMP). Most identified risks are expected to reduce to Low or Low-to-Moderate levels following the effective implementation of environmental, social, occupational health and safety, community health and safety, and GBV/SEA/SH mitigation measures. Residual risks are therefore considered acceptable and manageable under the World Bank Environmental and Social Framework (ESF) and the Somalia Food Systems Resilience Project (S-FSRP) Environmental and Social Management Framework (ESMF).

Table 3: Potential Negative Environmental and Social Risks and Impacts

Risk Category	Key Environmental and Social Risks/Impacts	Risk Rating	Residual Risk Rating
Construction Pollution	Dust and noise emissions from civil works, movement of construction machinery, material handling, and air quality deterioration affecting nearby communities.	Moderate	Low
Waste Management and Pollution	Improper disposal of construction debris, livestock manure accumulation, wastewater discharge, solid waste generation, odor nuisance, vector breeding (flies and rodents), and potential soil and water contamination during market operation.	Moderate	Low to moderate
Occupational Health and Safety	Injuries from construction equipment, exposure to dust, falling objects, inadequate use of PPE, and livestock handling hazards during market operation.	Moderate	Low
Community Health and Safety	Traffic risks from livestock transport vehicles, public exposure to construction activities, livestock-related accidents, spread of communicable diseases, and crowding around market areas.	Moderate	Low to moderate
Water Resource Use	Increased water demand for construction and livestock market operation, potential pressure on groundwater resources, and inefficient water use practices.	Low to Moderate	Low
Land Use and Site Disturbance	Temporary disturbance of the site during construction; no anticipated physical or economic displacement.	Low	Low
Gender-Based Violence, Sexual Exploitation and Harassment (GBV/SEAH)	Potential risks of sexual harassment, exploitation, abuse, and discrimination associated with labor influx, market interactions, and inadequate grievance mechanisms.	Low to Moderate	Low
Livestock and Public Health Risks	Possible zoonotic disease transmission, poor animal health management, inadequate veterinary inspection, and poor hygiene and sanitation practices.	Moderate	Low to moderate
Cultural Heritage	Chance discovery of archaeological, historical, or cultural materials during excavation and earthworks.	Low	Low
Security Risks	Site security concerns due to cross-border dynamics, theft, vandalism, conflicts among market users, and public gatherings around market facilities.	Low to Moderate	Low

4.2.2. Mini Traffic and Community Safety Plan

To minimize traffic-related and community health and safety risks during construction and operation of the Livestock Market, the Contractor will prepare and implement a Traffic and Community Safety Plan proportionate to the scale of project activities. The Plan will include the following measures:

Table 4: Community Safety Plan

Activity	Management Measure
Delivery Hours	Transportation of construction materials and equipment will be restricted to daylight hours (7:00 AM–6:00 PM) to reduce disturbance and accident risks.
Speed Limits	All project vehicles will observe a maximum speed limit of 20 km/h within the project site and near settlements, schools and market areas
Traffic Control Personnel	Trained flagmen will be deployed at site entry and exit points and at locations with high pedestrian or livestock movement during material delivery and construction activities.
Warning Signs and Barricades	Appropriate traffic signs, warning notices, reflective barriers, and safety markers will be installed around construction zones and access routes.
Community Notification	Communities, traders, and local authorities will be informed in advance of construction schedules, traffic diversions, and temporary access restrictions through public meetings and notices.
Pedestrian Safety	Safe pedestrian routes and temporary detours will be established and clearly marked where construction activities affect normal movement patterns.
Livestock Movement Management	Designated livestock entry and exit routes will be established to minimize conflicts between vehicles, livestock, and pedestrians during market operation.
Emergency Response	Emergency contact information and incident reporting procedures will be displayed at the site, and contractors will maintain first-aid equipment and trained personnel.

Driver Conduct	All drivers will receive orientation on safe driving practices, community interactions, and compliance with traffic management requirements.
Monitoring	Regular inspections will be conducted to ensure compliance with traffic management measures and to address any community concerns promptly.

4.2.3. GBV/SEA/SH Service Directory and Referral Pathways

The project recognizes the potential risks of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) associated with labor influx, contractor-community interactions, and market activities. To ensure timely, confidential, and survivor-centered support, the project will establish and maintain a GBV/SEA/SH referral pathway linking survivors to available services in the project area.

All GBV/SEA/SH incidents will be handled in accordance with the principles of confidentiality, safety, respect, non-discrimination, and informed consent. Survivors will have the right to decide whether to seek services and which services to access.

Table 5: GBV/SEA/SH Referral Pathway

Service Type	Support Provided	Referral Mechanism
GM Hotline	Confidential reporting, information, and referral support	State GM Hotline (560) and designated project focal points of GBV Specialist and Social Safeguard Specialist
Health Services	Emergency medical treatment, clinical management of rape, and reproductive health services	Referral to the nearest health facility providing GBV response services
Psychosocial Support	Psychological first aid, counselling, and emotional support	Referral to qualified psychosocial service providers and social workers
Protection Services	Safety planning, case management, and survivor support	Referral to protection partners and community-based protection actors
Legal Assistance	Legal advice and support where requested by the survivor	Referral to legal aid providers and justice institutions
Security Services	Immediate safety and protection measures where required and consented to by the survivor	Referral to appropriate security or law enforcement authorities

Referral Process

1. A GBV/SEA/SH complaint may be reported through the hotline, project grievance mechanism, SEA/SH focal point, contractor focal point, or trusted service provider.
2. The recipient of the complaint will not investigate the allegation or request detailed information beyond what is necessary for referral.
3. With the survivor's informed consent, the case will be referred immediately to appropriate service providers.
4. Personal information will be kept strictly confidential and shared only on a need-to-know basis and with the survivor's permission.
5. The survivor will determine whether to access medical, psychosocial, legal, protection, or security services.
6. Records maintained by the project will exclude personally identifiable information and will only track anonymized data for monitoring purposes.

Awareness and Information Disclosure

The project will disseminate information on available GBV/SEA/SH services, referral contacts, and reporting channels through community consultations, worker inductions, Codes of Conduct, notice boards, and stakeholder engagement activities. Contact information for the hotline (560) and available referral services will be displayed at the construction site and livestock market facilities in a manner that safeguards confidentiality and accessibility.

4.2.3. Grievance Mechanism Interface with SEA/SH Cases

The Project Grievance Mechanism (GM) will include specific procedures for handling Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) complaints in accordance with World Bank Good Practice Note requirements and survivor-centered principles. The GM will serve primarily as a confidential entry point for reporting and referral and will not be used to investigate or adjudicate SEA/SH allegations.

SEA/SH complaints may be submitted through designated SEA/SH focal points, confidential reporting channels, the project hotline, contractor focal points, or other trusted reporting mechanisms. Survivors may choose to remain anonymous and are not required to provide detailed information regarding the incident.

Upon receiving a SEA/SH complaint, the designated focal point will:

1. Ensure the immediate safety and confidentiality of the survivor.
2. Obtain informed consent before taking any action or making referrals.
3. Provide information on available support services and referral options.

4. Facilitate referrals to appropriate medical, psychosocial, protection, legal, or security services based on the survivor's wishes.
5. Maintain confidential records without collecting unnecessary personal information.
6. Report only anonymized and aggregated information for project monitoring purposes.

Table 6: The GM will apply the following survivor-centered principles:

Principle	Application in the GM
Safety	Always prioritize the physical and emotional safety of survivors.
Confidentiality	Protect survivor identity and information from unauthorized disclosure.
Respect	Treat survivors with dignity, empathy, and without judgment.
Non-Discrimination	Ensure equal access to services regardless of age, gender, disability, ethnicity, or social status.
Informed Consent	Obtain the survivor's voluntary agreement before any referral, information sharing, or action is taken.
Survivor Choice	Allow survivors to decide whether and which services they wish to access.

The Project Coordination Unit (SPCU), contractors, and implementing partners will ensure that all personnel responsible for grievance management receive training on SEA/SH-sensitive complaint handling, confidentiality requirements, referral pathways, and survivor-centered response procedures.

5. Environmental and Social Management Plan (ESMP) – Livestock Market Construction

The following ESMP table outlines mitigation and management measures for the construction and operation of the Livestock Market in Dhobley, consistent with the Environmental and Social Framework of the World Bank.

Table 7: Environment and Social Management Plan

Risks / Impacts	Risk Rating	Mitigation Measures	Monitoring Indicators	Project Phase	Timeline / Frequency	Responsibility
<i>ESSI – Assessment and Management of Environmental and Social Risks and Impacts</i>						
Risk of ineffective ESMP implementation, including weak integration of mitigation measures into site activities, limited contractor capacity, and inadequate monitoring and reporting during construction and operation phases.	Moderate	• Prepare and implement a site-specific C-ESMP, ensure ESF training for all workers, and integrate ESMP requirements into daily site activities. • Conduct regular supervision, monitoring, and reporting, with designated E&S focal persons to ensure compliance. • Apply adaptive management, maintain coordination among stakeholders, and ensure proper documentation of E&S performance.	• C-ESMP approved: 1 (Yes/No, pre-construction) • Workers trained: 100% of workforce; 1 induction training • Site inspections: 16 inspections (weekly) • E&S reports: 4 reports (monthly) • E&S focal persons: 2 persons (Env + Social), 100% presence • ESMP compliance: 100% (%) • Non-compliances resolved: 100% within days (%)	- Pre-Construction - Construction - Operational	• C-ESMP: Once (pre-construction) • Training: Before mobilization; quarterly refresher • Site inspections: Weekly • Monitoring & reporting: Daily monitoring; monthly reporting • Coordination meetings: Monthly	-Contractor; -SPCU Environmental and Social Specialists -Project Engineer

			• Coordination meetings: 4 meetings (monthly) • E&S records: 100% complete		• Corrective actions: As required • Documentation : Continuous	
<i>ESS2 – Labor and Working Conditions</i>						
• Risk of occupational injuries due to manual handling, masonry works, and use of basic construction equipment under limited safety awareness in Dhobley. • Risk of low PPE compliance due to hot climatic conditions (semi-arid heat) leading to discomfort and non-use by workers. • Risk of engagement of unskilled local labor without adequate OHS training, increasing accident probability. • Risk of informal labor practices, including lack of written contracts and unclear working conditions common in local construction settings. • Risk of child labor inclusion due to socio-	Moderate during and after construction	• Implement Labor Management Procedures (LMP), including worker contracts, age verification, and fair working conditions. • Provide adequate PPE, enforce OHS measures, and conduct regular toolbox talks and safety trainings. • Establish and operationalize a workers' grievance mechanism (GM). • Ensure proper worker welfare facilities (sanitation, drinking water, rest areas) on site.	• 100% Workers with contracts • 100% Workers age verified • 95% Workers using PPE • 16 Toolbox talks conducted (weekly for 4 months) • OHS incidents recorded: 0 fatalities; incidents tracked • Workers' GM functional: Yes/No; grievances resolved 90% • 100% Welfare facilities available	Pre-construction; Construction ; Operational	• Worker recruitment & verification: Pre-construction • OHS training: Before mobilization; 1 refresher • Toolbox talks: Weekly • PPE use & supervision: Daily • GM operation: Continuous • OHS monitoring & reporting: Monthly	-Contractor -SPCU Environmental and Social Specialists -Project Engineer

economic vulnerability in the area. • Risk of absence of functional workers' grievance mechanism, limiting reporting of workplace issues. • Risk of inadequate worker welfare facilities (water, sanitation, rest areas) due to limited site infrastructure.						
<i>ESS3 – Resource Efficiency and Pollution Prevention</i>						
• High dust levels along unpaved access roads and market surroundings due to dry, windy conditions. • Localized air emissions from construction vehicles and generators within a compact market area. • Soil contamination at work zones from fuel/oil leaks due to lack of designated servicing areas. • Uncontrolled dumping of construction waste in nearby open areas due to absence of formal disposal systems. • Poor site drainage causing water stagnation during rains due to flat	Moderate during and after construction	• Implement dust control (water spraying, covering materials, speed control). • Maintain machinery and prohibit open burning. • Designate fuel storage and maintenance areas with spill control. • Implement waste segregation and disposal at approved sites. • Construct drainage as per design and maintain flow paths. • Promote efficient water use and fix leakage	• Dust suppression: 2 times/day • Equipment maintained: 100% • Waste disposed properly: 90% • Spill incidents: 0 major; minor recorded • Drainage installed: 100% • Hazardous materials stored safely: 100% • Water leaks fixed: 48 hrs	Pre-construction; Construction ; Operational	• Site setup: Pre-construction • Dust control: Daily • Maintenance: Weekly • Waste disposal: Weekly / as generated • Drainage works: During construction • Monitoring/reporting: Monthly	-Contractor -SPCU Environmental and Social Specialists -Project Engineer

terrain and inadequate grading. • Leakage/spillage of fuels and lubricants from improper storage and handling. • Excessive water use during construction in a water-scarce environment.						
<i>ESS4 – Community Health, Safety, and Security</i>						
• Traffic accidents from construction trucks on busy market access roads. • Injury to community members from open excavations and moving machinery near the site. • Unauthorized access of children and pedestrians into active construction areas. • Traffic congestion at market entry points during material delivery. • GBV/SEA/SH incidents linked to worker presence in a vulnerable border community. • Transmission of communicable diseases due to worker–community interaction.	-Moderate construction -Low Operational	• Prepare and implement a Traffic Management Plan (designated routes, speed limits 30 km/h, signage). • Secure site with fencing, controlled entry points, and warning signs. • Schedule deliveries to avoid peak market hours. • Implement GBV Action Plan, including Code of Conduct and awareness training. • Provide sanitation facilities and conduct hygiene awareness. • Ensure security personnel are vetted, trained, and supervised	• Traffic incidents: 0 fatalities; Number of incidents recorded • Speed compliance: 30 km/h (Yes/No) • Site secured: 100% fenced • Signage installed: 100% • Code of Conduct signed: 100% • GBV cases referred: 100% • 4 Hygiene sessions • Security trained: 100%	Pre-construction; Construction; ; Operation	• Traffic plan: Pre-construction • Site security & traffic control: Daily • GBV training: Before mobilization; 1 refresher • Hygiene awareness: Monthly • Monitoring & reporting: Monthly	-Contractor -SPCU Environmental and Social Specialists -Project Engineer

• Security-related incidents due to untrained or unvetted guards						
<i>ESS5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</i>						
• Disputes over land ownership/boundaries due to weak or informal land tenure systems. • Loss of access to land or space used by informal traders or nearby users. • Economic displacement of small-scale vendors operating within or near the proposed market site. • Use of land without proper documentation or consent, especially under voluntary land donation arrangements. • Exclusion of vulnerable individuals (women, IDPs, youth) from compensation or livelihood restoration processes.	-Moderate construction -Low and Moderate Operational	• Conduct land verification and due diligence to confirm ownership and land status. • Apply Resettlement Policy Framework (RPF) and prepare Abbreviated RAP if required. • Document voluntary land donation with informed consent and third-party verification. • Provide compensation and/or livelihood support to affected persons before construction. • Ensure inclusion of vulnerable groups in consultation and compensation processes	• Land ownership verified: 100% (Yes/No) • Voluntary land donation documented: 100% (Yes/No) • Affected persons compensated: 100% before construction (%) • Livelihood restoration provided: 100% of affected persons (%) • Vulnerable groups included: 30% participation (%) • Grievances related to land resolved: 90% (%)	Pre-construction; Construction	• Land verification & documentation: Pre-construction • Compensation & support: Before construction • Monitoring of affected persons: Monthly (during construction) • GM operation: Continuous	-Contractor -SPCU Environmental and Social Specialists -Project Engineer
<i>ESS6 – Biodiversity Conservation</i>						
• Disturbance of low-density vegetation (shrubs and grasses) within the proposed market site footprint. • Minor disturbance to common small fauna (e.g.,	-Low Construction -Moderate Operational	• Conduct and document a site-specific biodiversity screening checklist prior to construction to confirm absence of sensitive habitats, protected species, or critical ecosystems. • Clearly demarcate site boundaries and restrict all activities within the	• Biodiversity screening completed and documented: 1 (Yes/No, pre-construction) • Sensitive features identified and	Pre-construction; Construction; Operation	• Screening and verification: Pre-construction • Site demarcation: Before works	-Contractor -SPCU Environmental and Social Specialists

reptiles, rodents) due to excavation and site clearing. • Potential encroachment into adjacent open land if site boundaries are not clearly defined. • Attraction of stray animals (e.g., goats) due to poor waste handling at the construction site. • Indirect disturbance to nearby seasonal drainage lines (if present) through uncontrolled runoff or waste disposal.		approved footprint. • Limit vegetation clearance strictly to required construction areas; no clearing outside footprint. • Identify and protect any nearby ecological features (e.g., seasonal water channels, natural drainage paths) during site planning and construction. • Prohibit hunting, trapping, or harming of wildlife by workers. • Implement proper waste management to avoid attracting animals	protected: 100% (Yes/No) • Site boundary compliance: 100% (%) • Vegetation clearance within footprint only: 100% (%) • Wildlife disturbance incidents: 0 (#) • Waste managed to prevent animal attraction: 90% compliance (%)		start • Monitoring of compliance: Weekly inspections • Waste control: Continuous	-Project Engineer
<i>ESS8 – Cultural Heritage</i>						
• Unanticipated discovery of buried cultural materials (artifacts, graves) during excavation works. • Disturbance of unmarked burial sites due to lack of formal mapping of cultural locations. • Damage to locally significant sites or objects due to contractor unawareness	-Low Construction	• Implement a Chance Finds Procedure in all excavation works. • Train workers to recognize and report cultural materials immediately. • Stop work and secure the site upon discovery until assessment by relevant authorities. • Coordinate with local authorities and community elders for verification and guidance	• Chance Finds Procedure in place: 1 (Yes/No, pre-construction) • Workers trained on chance finds: 100% (%) • Chance find incidents managed per procedure: 100% (%) • Work stoppage applied when required: 100% compliance (%)	Pre-construction; Construction	• Procedure preparation: Pre-construction • Worker training: Before excavation • Monitoring: Continuous during excavation	-Contractor -SPCU Environmental and Social Specialists -Project Engineer
<i>ESS10 – Stakeholder Engagement and Information Disclosure</i>						
• Limited participation of local traders and vulnerable	Moderate	• Implement the Stakeholder Engagement Plan (SEP) with inclusive	• Stakeholder consultations	Pre-construction;	• Stakeholder consultations:	-Contractor

groups (women, youth, IDPs) in project consultations. • Low awareness of construction activities and timelines among nearby communities and market users. • Ineffective grievance mechanism (GM) leading to unresolved complaints. • Information gaps between contractor and community causing misunderstandings and tension. • Exclusion of cross-border traders due to inadequate communication in a border market setting.	(Construction & Operation)	and targeted consultations. • Ensure timely disclosure of project information (activities, schedules, impacts) in accessible formats. • Establish and operationalize a functional GRM with clear procedures and response timelines. • Conduct regular community meetings and awareness sessions. • Ensure targeted engagement of vulnerable groups and cross-border traders	conducted: ≥ 4 meetings • Vulnerable group participation: 30% (%) • Project information disclosed: 100% (Yes/No) • GM established and functional: 1 (Yes/No) • Grievances received and resolved: 90% (%) • Community awareness sessions:	Construction ; Operation	Pre-construction and monthly during construction • Information disclosure: Before and during construction (continuous updates) • GM operation: Continuous • Awareness sessions: Monthly	-SPCU Environmental and Social Specialists -Project Engineer
<i>SEA/SH – Sexual Exploitation, Abuse & Harassment</i>						
• SEA/SH incidents linked to presence of external workers in a vulnerable border community. • Exploitation of women and girls near the market site due to economic vulnerability. • Sexual harassment in and around the construction site involving workers and community members. • Underreporting of	-Moderate Construction -Low Operation	• Develop and implement a SEA/SH Action Plan. • Enforce Code of Conduct (CoC) for all workers with zero tolerance provisions. • Conduct mandatory SEA/SH awareness and training for workers and communities. • Establish confidential, survivor-centered GRM channels. • Map and coordinate with local GBV service providers and establish referral pathways.	• Code of Conduct signed: 100% of workers (%) • SEA/SH training conducted: 2 sessions • GRM with confidential SEA/SH channels: Functional (Yes/No) • GBV service providers mapped: 1 mapping completed (Yes/No)	Pre-construction; Construction ; Operation	• SEA/SH Action Plan & CoC: Pre-construction • Training: Before mobilization; 1 refresher • Awareness sessions: Monthly • GRM operation:	-Contractor -SPCU Environmental and Social Specialists -Project Engineer -GBV Specialist

SEA/SH cases due to stigma and lack of confidential reporting channels. • Limited access to survivor support services in Dhobley		• Ensure accountability measures and disciplinary actions for violations.	• SEA/SH cases referred using protocol: 100% • Awareness sessions conducted: 4		Continuous • Monitoring & reporting: Monthly	
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6. Environmental and Social Monitoring Plan

The Environmental and Social Monitoring Plan ensures systematic tracking of mitigation performance for the Livestock Market project in **Dhobley** in accordance with the requirements of the World Bank Environmental and Social Framework.

Table 8: Environmental and Social Monitoring plan

Environmental & Social Aspect	Monitoring Indicators	Monitoring Method	Responsibility	Frequency	Reporting Requirement
Air Quality and Dust Control	Number of dust control activities; visible dust level	Site inspection and observation	Contractor, Supervising Engineer	Daily during construction	Monthly monitoring report
Noise and Vibration	Compliance with daytime construction schedule; community complaints	Field measurement and community feedback	Contractor	Weekly	Monthly report
Waste Management	Presence of waste containers; volume of waste removed; manure management status	Site inspection	Contractor, Market Management Committee	Weekly during construction and operation	Quarterly report
Occupational Health and Safety	PPE usage rate; number of accidents; safety training records	Worker inspection and accident log review	Contractor, SPCU	Continuous	Monthly safety report

Community Health and Safety	Site fencing condition; traffic control effectiveness	Physical inspection	Contractor, District Authority	Continuous	Monthly monitoring summary
Water Resource Use	Water consumption level; source compliance	Review of water supply records	Contractor	Weekly	Monthly environmental report
GBV/SEAH Risk Management	Worker code of conduct enforcement; GM complaint records	Training and GM log review	Contractor, SPCU	Monthly	Quarterly safeguard report
Livestock Health and Hygiene	Veterinary inspection records; animal disease control measures	Coordination with veterinary officers	District Veterinary Office	Continuous	Quarterly summary
Solid Waste and Market Sanitation	Market cleanliness status; waste disposal frequency	Market inspection	Market Management Committee	Weekly	Monthly operational report
Security and Crowd Management	Security incident records; access control performance	Security coordination meetings and observation	District Security Authority	Continuous	Incident reporting
Cultural Heritage Protection	Chance finds reporting cases	Contractor site supervision	Contractor	As needed	Immediate incident report

The monitoring results will be compiled and submitted to the Project Coordination Unit for review and compliance verification throughout the project implementation cycle.

7. Capacity Building Plan

The Capacity Building Plan aims to strengthen environmental and social risk management capacity for project implementers, contractors, and local stakeholders involved in the Livestock Market construction in **Dhobley**, in line with the safeguard's requirements of the World Bank

Table 9: Capacity Building Plan

Training Module	Target Audience	Duration	Trainer/Facilitator	Frequency	Training Materials Language	Verification Method	Record Storage Location
Environmental and Social Safeguards (ESS) Requirements	Contractor staff, SPCU staff, District Officials	1 Day	Environmental and Social Safeguard Specialists	Before construction and annual refresher	Somali and English	Attendance Sheet and Pre/Post-Test	SPCU Safeguards Unit
Occupational Health and Safety (OHS)	Construction workers, Site Supervisors	1 Day	OHS Specialist/Contractor HSE Officer	Before construction and quarterly toolbox talks	Somali and English	Attendance Record and Practical Demonstration	Contractor Site Office and SPCU
Waste Management and Environmental Hygiene	Market Committee, Workers, Cleaners	1 Day	Environmental Specialist	Before construction and semi-annually during operation	Somali and English	Attendance Record	SPCU and Market Management Office
GBV/SEA/SH Prevention and Response	Workers, Security Personnel, Community Representatives	1 Day	GBV Specialist	Before construction and every six months	Somali and English	Attendance Record and Code of Conduct Acknowledgment	SPCU GBV Focal Point Files
Community Health and Safety	Traders, Transport Operators, Community Leaders, Market Users	1 Day	Environmental and Social Specialists	Before construction and annually	Somali and English	Attendance Record	SPCU and District Authority

Traffic Safety Management	Drivers, Equipment Operators, Site Supervisors	Half Day	Contractor HSE Officer	Before construction and quarterly	Somali and English	Attendance Record	Contractor Site Office
Grievance Mechanism (GM) Management	Project Staff, Market Committee Members, GRM Focal Points	1 Day	Social Safeguards Specialist	Before operation and annual refresher	Somali and English	Attendance Record and Practical Exercise	SPCU Social Safeguards Unit
Livestock Market Hygiene and Disease Control	Veterinary Officers, Traders, Market Staff	1 Day	District Veterinary Authority	Before operation and annually	Somali and English	Attendance Record	Veterinary Office and Market Management Committee
Emergency Preparedness and Response	Workers, Security Personnel, Market Management Committee	Half Day	OHS Specialist and Local Emergency Services	Before operation and annually	Somali and English	Attendance Record and Drill Report	SPCU and Contractor Records

8. Institutional Roles and Responsibilities

1. State Project Coordination Unit (SPCU)

- Provide overall environmental and social safeguards oversight for the Livestock Market subproject in **Dhobley**.
- Ensure compliance with the ESMP, ESF standards of the World Bank, and national safeguard requirements.
- Monitor implementation performance and review environmental and social reports submitted by the contractor.
- Coordinate stakeholder engagement, capacity building, and grievance mechanism (GM) operations.

2. Ministry of Livestock and Forestry Resources (MOLFR)

- Provide technical guidance on livestock market operations, animal health, and veterinary inspection standards.
- Support disease surveillance, zoonotic disease prevention, and livestock hygiene management within the market.
- Participate in monitoring and evaluation of environmental and social performance during construction and operation phases.

3. Contractor and Subcontractors

- Prepare and implement site-specific Environmental, Social, Health and Safety (ESHS) management plans.
- Implement all ESMP mitigation measures related to construction activities.
- Ensure occupational health and safety compliance, provide personal protective equipment (PPE), and enforce worker codes of conduct.
- Manage construction waste, control dust and noise pollution, and maintain site security and community safety.
- Report environmental and social incidents to the supervising authorities and SPCU in a timely manner.

Table 10: RACI Matrix for ESMP Implementation and Compliance

Activity	SPCU	MOLFR	Contractor	Supervising Engineer	NPCU	World Bank
ESMP implementation	A	C	R	C	I	I

Preparation and approval of Contractor ESMP (C-ESMP), OHS Plan, Waste Management Plan, Traffic Management Plan, and GBV Action Plan	A	C	R	C	I	I
Review and approval of site-specific sub-plans	A	C	R	R	I	I
Environmental and social site inspections	A	C	R	R	I	I
Occupational Health and Safety monitoring	C	I	R	A	I	I
Community health and safety monitoring	A	C	R	R	C	I
Stakeholder engagement and consultations	A	C	I	I	R	I
Grievance Mechanism implementation	A	I	C	I	C	I
Incident and accident notification	A	I	R	C	I	I
GBV/SEA/SH response and referral	A	I	R	I	C	I
Design modifications with E&S implications	A	C	R	R	I	I
Stop-work decision for serious E&S non-compliance	A	I	R	R	I	I
Monthly E&S compliance reporting	A	I	R	C	I	I
Monitoring and evaluation of ESMP performance	A	C	R	C	I	I

9. Reporting Plan

Environmental and social performance reporting for the Livestock Market construction in Dhobley will be conducted to ensure continuous compliance with ESMP requirements and safeguard standards of the World Bank.

Table 11: Reporting Plan

Report Type	Content	Prepared By	Submitted To	Frequency
Contractor Environmental and Social Report	ESMP mitigation implementation status, OHS performance, waste	Contractor and Subcontractors	SPCU and Supervising Engineer	Monthly

	management, incidents, and site inspection results			
Supervision Monitoring Report	Compliance verification of ESMP measures, site safety conditions, and corrective actions	Supervising Engineer	SPCU	Monthly
SPCU Safeguard Performance Report	Overall environmental and social performance, stakeholder engagement outcomes, GM status, and risk management updates	ESS SPCU	NPCU and WB	Quarterly
Incident and Accident Reporting	Any environmental, social, or occupational safety incident occurring during project implementation	Contractor → SPCU	Immediate notification (within 24 hours) followed by detailed report within 3 days	
Annual Environmental and Social Audit Report	Comprehensive review of ESMP implementation effectiveness and compliance status	Independent Auditor / SPCU	World Bank and National Authorities	Annually

Table 12: Incident Classification and Notification Requirements

Incident Classification	Example Incidents	Initial Notification	Detailed Report	Responsible for Notification
Severe	Fatality, life-threatening injury, major environmental pollution, confirmed SEA/SH allegation involving project workers, major security incident	Within 24 hours	Within 48 hours	Contractor → Supervising Engineer → SPCU → NPCU → World Bank
Serious	Lost-time injury, major community protest, significant	Within 24 hours	Within 3 days	Contractor → SPCU → NPCU

	environmental damage, major traffic accident			
Moderate	Medical treatment injury, localized pollution event, significant grievance requiring management action	Within 48 hours	Within 7 days	Contractor → SPCU
Minor	First aid cases, minor spills, housekeeping issues, near misses with no injury	Included in Monthly Report	Not required unless recurring	Contractor → Supervising Engineer

All incidents and near misses shall be recorded in the project incident register. The Contractor shall immediately notify the Supervising Engineer and SPCU of any severe or serious incidents. The SPCU shall notify the NPCU and the World Bank in accordance with ESF incident reporting requirements. Corrective actions shall be implemented promptly, tracked to completion, and verified during supervision visits. Incident trends shall be reviewed as part of monthly and quarterly environmental and social performance reports.

10. Public Consultation and Feedback

Two public consultation meetings were conducted in Dhobley as part of the stakeholder engagement process for the Livestock Market subproject. The consultations were organized by the Ministry of Livestock and Forestry Resources (MOLFR) in collaboration with the State Project Coordination Unit (SPCU) and involved district authorities and community representatives.

The first meeting was held between MOLFR, SPCU, and district authorities. The main discussion points included project overview, request for suitable land allocation for the livestock market construction, and the importance of the market in enhancing livestock trade, supporting local economic activities, and improving community livelihoods.

The second consultation meeting was conducted with community representatives and focused on the site identified by district authorities for the proposed livestock market. Discussions covered potential project opportunities such as employment creation, improved livestock marketing, and better trading conditions, as well as possible challenges related to market hygiene, waste management, animal health control, security, and operational sustainability.

Key concerns raised by participants included the need for proper sanitation and drainage systems, livestock disease prevention measures, improved security arrangements, inclusive access for women and youth traders, and the establishment of a functional grievance mechanism (GM).

Overall, the consultations demonstrated strong community support for the livestock market project. The feedback received was incorporated into the ESMP mitigation measures and management plan. The meeting minutes and attendance sheets are provided in Annex 5 and Annex 6.

Table 13: Stakeholder Engagement Log and Issues Matrix

Stakeholder Group	Issue Raised	Project Response	ESMP Reference
District Authorities	Need for suitable land with good accessibility and adequate space for livestock trading	Government-owned land was allocated and confirmed suitable for the proposed livestock market development	Section 3: Project Description and Site Selection
Community Representatives	Employment opportunities for local communities during construction	Contractor will prioritize local labor recruitment where feasible and provide equal employment opportunities	Section 4.1 Positive Impacts; ESMP Mitigation Measures
Community Representatives	Need for proper sanitation facilities and drainage systems	Market design includes toilets, drainage systems, wastewater management, and waste collection facilities	ESS3 Mitigation Measures
Livestock Traders	Concerns regarding livestock disease control and animal health inspection	Veterinary inspection facilities and disease surveillance measures will be incorporated into market operations	ESS4 Community Health and Safety
Women and Youth Traders	Need for inclusive access to market facilities and economic opportunities	Equal access provisions and stakeholder engagement measures will promote participation of women and youth	ESS10 Stakeholder Engagement
Community Representatives	Need for effective waste management and environmental cleanliness	Waste management procedures, manure handling, and sanitation measures are included in the ESMP	ESS3 Resource Efficiency and Pollution Prevention

Community Representatives	Concerns regarding site security and theft risks	Security measures, site fencing, lighting, and coordination with local authorities will be implemented	ESS4 Community Health and Safety
Community Representatives	Need for accessible grievance redress mechanism	Project GM including hotline 560 and community-level complaint channels will be established and publicized	Grievance Mechanism Section

Disclosure and Ongoing Stakeholder Engagement Plan

The Project will maintain continuous stakeholder engagement throughout construction and operation of the Livestock Market to ensure transparency, accountability, and timely communication of project information. Information will be disclosed in culturally appropriate and accessible formats, including Somali language materials where necessary.

Table 14: Disclosure and Ongoing Stakeholder Engagement Plan

Activity	Target Stakeholders	Method of Disclosure/Engagement	Frequency	Responsible Entity
Disclosure of ESMP and Project Information	Community members, traders, local authorities	Publication of FSRP websites, market site, and community gathering areas	Prior to construction and when updates occur	SPCU, NPCU and District Authority
Community Awareness Meetings	Community members, traders, women and youth groups	Public meetings and community consultations	Quarterly during construction	SPCU and Contractor
Information Materials	Local communities and market users	Somali-language information sheets, posters, and notices	As needed	SPCU
Radio Announcements (where applicable)	Wider community and surrounding villages	Local radio broadcasts on project activities, traffic disruptions, and GM access	Prior to major activities and as needed	SPCU and District Authority
Stakeholder Feedback Meetings	Community representatives, market	Consultation meetings and focus group discussions	Semi-annually	SPCU and Market

	committees, traders		during operation	Management Committee
Grievance Mechanism Awareness	Communities, workers, traders	Posters, meetings, induction sessions, and notice boards	Continuous	SPCU and Contractor
Contractor Community Briefings	Nearby residents and road users	Advance notice of construction activities, road diversions, and temporary disruptions	Before major construction activities	Contractor

All key project documents and stakeholder engagement materials will be made available in Somali language where appropriate. Notice boards will be maintained at the District Headquarters and the Livestock Market construction site throughout project implementation. Community meetings will be conducted at least quarterly during construction and semi-annually during operation to provide project updates, discuss concerns, and obtain stakeholder feedback. Where feasible, local radio announcements will be used to reach wider audiences and inform communities about project activities, grievance channels, and safety information.

11. Grievance Mechanism (GM)

A functional Grievance Redress Mechanism is established to address complaints and concerns arising from the Livestock Market subproject. The GM will operate through two complementary channels: community-level grievance management and worker-related grievance handling.

Community GM

- Community members, traders, and market users will be able to submit complaints related to market construction, environmental disturbances, safety concerns, service access, or operational issues.
- Complaints may be submitted verbally, in writing, or through designated complaint boxes and community representatives.
- Received grievances will be recorded, reviewed, and resolved in a timely and transparent manner by the market management committee and project authorities.
- The GM will ensure accessibility for women, youth, and vulnerable groups.

Workers' GM

- A separate grievance mechanism will be available for contractors' workers and subcontractor staff to address employment, working conditions, safety, or harassment-related complaints.
- Workers will be informed about grievance procedures during induction training and through posted workplace notices.

- Complaints will be handled confidentially and resolved in accordance with labour regulations and project safeguard requirements of the World Bank.

All complaints will be submitted through the following channels

Email address:	jubbalandgm@gmail.com jubbalandgbv@gmail.com
Free hotline number (s):	560

The GM system will ensure timely response, documentation, and resolution of complaints throughout the construction and operational phases of the project.

12. ESMP Implementation Budget

The ESMP implementation budget for the Livestock Market subproject in Dhobley covers environmental and social management activities during pre-construction and construction phases only. The budget is aligned with the safeguard requirements of the World Bank.

Table 15: ESMP Implementation Budget

#	Activity / Resource	Unit	Quantity	Unit Cost (USD)	Total Cost (USD)	Responsibility
1	EHS induction training & toolbox talks	Sessions	12	200	2400	Contractor
2	Emergency Preparedness & Response (EPRP), fire drills	Events	3	800	2400	Contractor
3	Stakeholder & community consultations	Sessions	6	400	2400	MOLFR
4	Grievance Mechanism (GM)	Lump sum	1	2000	2000	MOLFR
5	Site supervision & monitoring	Months	4	1200	4800	MOLFR
6	Documentation & communication	Lump sum	1	1500	1500	MOLFR
7	GBV/SEA/SH mitigation	Package	1	4000	4000	MOLFR
8	Security personnel vetting & training	Package	1	2500	2500	Contractor
9	Environmental monitoring	Events	4	600	2400	Contractor

10	Waste management	Lump sum	1	3000	3000	Contractor
11	PPE and safety equipment	Lump sum	1	3500	3500	Contractor
12	OHS compliance & worker welfare	Lump sum	1	2500	2500	Contractor
13	Operational phase mitigation	Lump sum	1	2000	2000	MOLFR
14	ESS and GBV Specialist Slaries	3 persons	4	3,419	41,028	MOLFR
TOTAL					\$76,428	

ANNEXES

Annex 1. Environment & Social Screening for Livestock Market construction

Environmental and Social Screening for the Somali Food System Resilient Project

Environmental and Social Screening for the Somali Food System Resilient Project	
SECTION A: General Sub-Project Information	
Date of screening	19 th of September 2025
Activity/Sub- project title	Environmental and Social Screening for the Somali Food System Resilient Project
Activity/Sub- project component	Construction of Livestock Market
Proposed activity duration	3 months
ES Screening Team Leader and Contact Details	Abdi Noor Shobaay Ismail Ali Mohamed
Name of Executing Agent	Ministry of Livestock, Forest and Range of Jubbaland State, Somalia.
Site/Activity location (including GPS coordinates)	Danwadaag Village, Dhobley District. The site is located at 0°23'17.0" N 41°00'01.9" E
New/Rehabilitation project	New project.
Objective of the screening process	i. i. To assess the suitability of the proposed site for the Livestock Market construction in Dhobley District. ii. ii. To identify potential Environmental and Social (E&S) risks and impacts of the Livestock Market sub-project and propose appropriate mitigation measures. iii. iii. To determine the risk classification of the sub-project in accordance with the World Bank Environmental and Social Framework (ESF) and identify the required E&S instrument(s). iv. iv. To incorporate identified mitigation measures into a detailed Environmental and Social Management Plan (ESMP). v. v. To ensure that the Environmental and Social screening results are integrated into the Livestock Market sub-project design and implementation under the Somalia Food Systems Resilience Program.

E&S Framework and Overall Project Risk Classification	Moderate Risk (C)
Project Description. Briefly describe the project activities	The proposed sub-project involves the construction and operation of a Livestock Market in Dhobley District to improve livestock trade, market access, and local livelihoods. Construction activities will include development of livestock holding pens, shaded trading areas, loading ramps, veterinary inspection space, water supply, sanitation facilities, drainage systems, waste collection points, internal access roads, perimeter fencing, and lighting. Proper waste and wastewater management systems will be established to manage manure and other market waste. Designated loading and unloading zones will reduce congestion and improve safety. Stakeholder engagement will ensure inclusive participation of women, minority groups, and persons with disabilities. During operation, the Livestock Market will serve as a regulated trading hub, improving hygiene, animal health inspection, price transparency, and economic development in Dhobley District under the Somalia Food Systems Resilience Program.

ESS 1: Assessment and Management of Environmental and Social Risks and Impacts

No.	Screening Question	Yes	No	UNK	Reference Instrument	Remarks
1.1	Does the Livestock Market construction require an Environmental and Social assessment to address potential risks?	Yes			ESMF	Project requires ESMP
1.2	Could remoteness or insecurity limit effective project supervision and monitoring?		No		ESMP, C-ESMP	
1.3	Will current land uses at the proposed site be disrupted?		No		ESMP	Surrounding settlements
1.4	Could the project influence future land use in the surrounding area?		No		ESMP	

1.5	Is there a risk of increased population due to workers or traders?		No		LMP	
1.6	Could the chosen site create disputes or community tensions?		No		SEP, GM	
ESS 2: Labor and Working Conditions						
2.1	Will the Livestock Market project create job opportunities for local community members?	Yes			LMP	Implement LMP
2.2	Is there a risk of child labor or forced labor during construction or operation?	Yes			LMP, OHSMP, GM	
2.3	Does the project involve civil works or physical infrastructure development?	Yes			LMP, C-ESMP, OHSMP	
2.4	Will the project require bringing in workers from outside the local area?		No		OHSMP, C-ESMP	
2.5	Could workers face security threats during construction or operation?		No		LMP, SMP	
2.6	Is there a risk of occupational health and safety (OHS) incidents on site?	Yes			OHSMP	Slips, falls, struck by objects
2.7	Is there a possibility of delayed wage payments to workers?		No		LMP, GM	Workers paid daily

2.8	Is there a risk that workers may be paid below agreed or legal rates?		No		LMP	
ESS 3: Resource Efficiency and Pollution Prevention						
3.1	Will the project use significant water, land, or materials?	Yes			ESMP, C-ESMP	
3.2	Will hazardous materials be used or stored?		No		ESMF, OHSMP	
3.3	Will solid waste be produced?	Yes			ESMP	
3.4	Will hazardous waste be generated?	Yes			WMP, C-ESMP	
3.5	Will activities cause dust or noise?	Yes			C-ESMP	
3.6	Is there a risk of soil erosion?	Yes			C-ESMP	
3.7	Will wastewater be generated?	Yes			C-ESMP	
3.8	Could drinking water sources be affected?		No		ESMP	
3.9	Is there a risk of land or water contamination?		No		C-ESMP	
3.10	Will construction cause ground vibration?	Yes			C-ESMP	
3.11	Will air pollutants be emitted?	Yes			C-ESMP, OHSMP	
3.12	Will vegetation or wildlife be disturbed?		No		C-ESMP	The area is within the district settlement with no vegetation and wildlife

3.13	Could surface or groundwater be affected?		No		ESMP	
3.14	Will chemicals be used?	Yes			ESMP	Paints will be used
3.15	Is there a risk of fuel or chemical spills?		No		ESMP	
ESS 4: Community Health and Safety						
4.1	Could livestock market construction affect community health and safety?		No		ESMP	
4.2	Will access roads or public facilities be disrupted?		No		GM	
4.4	Could workers or traders increase GBV risks?	Yes			GM, LMP, SEAH PRP	
4.5	Could livestock market construction spread diseases?	Yes			LMP, C-ESMP	
4.6	Could the market create security concerns?		No		LMP	
4.7	Are there safety risks during construction or operation?	Yes			ESMP, OHSMP	
4.9	Could people be exposed to dust, waste, or noise?	Yes			C-ESMP, OHSMP	
4.10	Will livestock market construction materials transport increase traffic risks?	Yes			C-ESMP	
4.11	Is there a risk of nearby open wells?		No		ESMP	

4.12	Could livestock market activities spread pathogens?		No		WMP	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement						
5.1	Will the construction cause physical or economic displacement?		No		ESMP, RPF	
5.2	Is the construction site located in or near a conflict-prone area?		No		ESMP, RPF	
5.3	Could the construction affect income-generating activities?		No		SEP, RPF	
5.4	Is there a risk of land ownership or use conflicts?		No		ESMP, RPF	The land was owned by government and authorization documents was recorded
5.5	Will construction block access to nearby properties or routes?	Yes			ESMP, GM, RPF	
5.6	Will the project require new land acquisition?	Yes			RPF	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	Is the market located near a protected or environmentally sensitive area?		No		ESMF	
6.2	Will the project change natural land use?		No		ESMF	
6.3	Could livestock market activities disturb wildlife movement?		No		ESMP	The area has no wildlife animals

6.4	Could the project affect protected or conserved areas?		No		ESMP	
6.5	Could the construction affect ecosystems used by the community?		No		ESMP	
6.6	Will existing infrastructure services be overloaded?		No		ESMP	
6.7	Will the project extract water from surface or groundwater sources?		No		ESMP, C-ESMP	
6.8	Could the project affect environmentally sensitive zones?		No		ESMP	
6.9	Could the project cause loss of vegetation, habitat, or ecological resources?		No		ESMP	
ESS 8: Cultural Heritage						
8.1	Is the livestock market located close to any cultural or historical heritage site?		No		ESMP	
8.2	Is there a possibility of encountering archaeological or cultural artifacts during construction?		No		ESMP	
ESS 10: Stakeholder Engagement and Information Disclosure						
10.1	Could stakeholder consultation be insufficient?		No		SEP	Two days consultation meetings was conducted
10.2	Are people with disabilities usually		No		SEP	

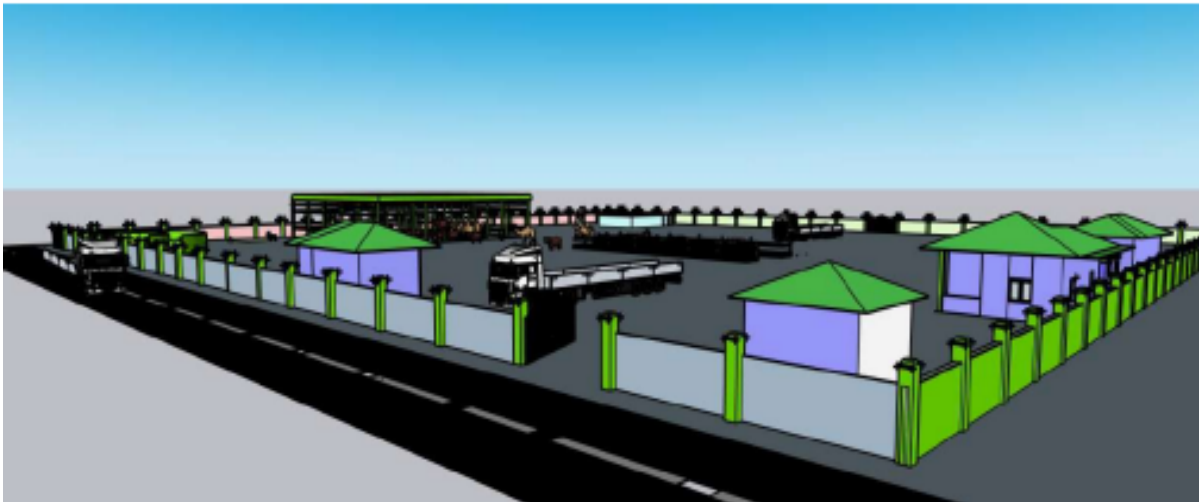
	excluded from community decision-making?					
10.3	Is community consultation not commonly practiced?		No		SEP	
10.4	Do women participate in project-related decisions?	Yes			SEP	
10.5	Could lack of inclusion lead to community complaints?		No		SEP, GM	

SUMMARY OF THE E&S SCREENING PROCESS

E&S Screening	Results and Recommendation		
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Individual Risk/ Impact Rating	Mitigation At the end of the screen process, tabulate the mitigation measures in an ESMP Format (see below)
	Moderate	C	
Is Additional Assessment Necessary? Evaluate the Risks/Impacts and reflect on options (see below)	Screening Result - Environmental and Social Assessment (ESMP) required for the livestock market construction. -Soil erosion and land disturbance during site preparation and construction activities. -Community health and safety risks related to construction works and market operation. -Worker occupational health and safety (OHS) risks during construction and operation. -Noise, dust, and vibration from construction machinery may affect nearby communities and workers. -Risks of social exclusion, including limited participation of women, persons with disabilities, and minority groups.		Mitigation measures will follow ESMF : - Stakeholder Engagement Plan (SEP) -Grievance Mechanism (GM) -Security Management Plan (SMP) - Labour Management Procedures (LMP) -Occupational Health and Safety (OHS) measures -Gender-Based Violence (GBV) Action Plan - Waste Management Plan -Community Health and Safety Measures -Environmental monitoring and supervision plan

No ESIA is required.		
Summary of Screening Result Justification		The Livestock Market construction sub-project in Dhobley District is expected to have moderate environmental and social risks that can be effectively managed through standard mitigation measures. The main risks are associated with construction activities, waste and wastewater generation, occupational and community health and safety, labor influx, and potential social tensions related to site selection and stakeholder inclusion. The screening process determined that no significant or irreversible environmental or social impacts are anticipated. Therefore, the sub-project is suitable for implementation subject to preparation and implementation of mitigation measures outlined in the Environmental and Social Management Plan (ESMP) in accordance with the Environmental and Social Framework of the World Bank under the Somalia Food Systems Resilience Program.
Authorization		
Approved by: Ismail Ali Mohamed Social Safeguard specialist Signature..... Date. 19/09/2025	Approved by: Abdi Noor Shobaay Environmental Safeguard Specialist Signature. Date. 19/09/2025	

Annex 2: Livestock Market Construction Design



Annex 3: Code of Conduct for Workers

All workers engaged in the project must read, understand, and comply with this Code of Conduct (CoC) and all Environmental, Social, and Occupational Health and Safety (OHS) requirements.

Failure to comply with the CoC, Environmental, Social, or OHS standards will be considered gross misconduct and may result in disciplinary action, including warning, suspension, termination, or legal reporting.

Workers shall:

- Participate in OHS, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) training as required.
- Avoid alcohol, narcotics, or any substances that may impair work performance during working hours.
- Treat all persons with respect regardless of gender, age, ethnicity, religion, disability, or social status.
- Refrain from harassment, abusive, sexually provocative, or culturally inappropriate behaviour.
- Not engage in sexual harassment, sexual exploitation, or sexual relationships with children (under 18 years).
- Avoid sexual relations with community members involving exchange of benefits.
- Report any suspected GBV, violence against children (VAC), or CoC violations.

Regarding child protection:

- Avoid working alone with children where possible.
- Do not invite unaccompanied children to the worksite.
- Do not use digital devices to exploit, harass, or access child pornography.
- Do not apply physical punishment to children.
- Comply with national labour laws and World Bank child labour and minimum age requirements.

Sanctions for CoC Violation:

- Warning (informal or formal)
- Mandatory training
- Salary deduction up to one week

- Suspension without pay (1–6 months)
- Employment termination
- Police reporting if required

Signature: _____

Date: _____

Location: _____

Annex 4-Pictorial Community consultation meeting



Annex 5: Public Consultation Meetings Minutes

Day 1 Stakeholder Engagement Meeting Minutes

1. **Consultation Date:** 18–19 September 2025
2. **Sub-project Type:** Livestock Market Construction
3. **Project Name:** Somalia Food Systems Resilience Program
4. **Place of Consultation:** Jubbaland State – Lower Jubba Region – Dhobley District – Danwadaag Village

Purpose of Consultation

- To inform local authorities, community members, and stakeholders about the proposed livestock market construction, including project scope, timeline, and expected benefits.
- To discuss site suitability, construction requirements, and request for construction site allocation.
- To ensure compliance with the Environmental and Social Framework (ESF) of the World Bank.

Consultation Time Started: 9:00 AM

Consultation Method: Face-to-face meeting

Consultation Agendas/Issues

- Project overview and implementation plan
- Request for construction site allocation
- Importance of livestock market construction for local development

Additional Issues Raised During Consultation

The project team presented the livestock market construction project, highlighting its objectives, expected benefits, and implementation activities. Local authorities were informed that the market will improve livestock trade, support local economic growth, and create market opportunities for pastoralists and traders.

The requirements of the World Bank ESF were explained, including environmental protection, occupational and community health and safety, inclusion of vulnerable groups, and establishment of a Grievance Mechanism (GM).

Local authorities confirmed that the identified construction site is government-owned land, free from private ownership disputes, and suitable for project use. Community representatives expressed general support for the project.

Agreed Agendas/Issues

- The proposed site is government-owned land and free from disputes or encumbrances.
- An Environmental and Social Management Plan (ESMP) will be prepared before construction.
- Occupational Health and Safety (OHS) measures will be implemented, including PPE provision, site fencing, and dust control.
- A functional GM will be established and communicated to the community and workers.
- Local employment opportunities will be considered where feasible.
- Continuous stakeholder engagement will be maintained during project implementation.

Disagreed Agenda/Issues

- No major disagreements were raised. Participants expressed general support for the project.

Consultation Ended Time: 12:00 PM

Day 2 Community Consultation Meeting Minutes

Consultation Time Started: 10:00 AM

Consultation Agendas/Issues

- Discussion on the importance of livestock market construction in improving trade, livelihoods, and community resilience.
- Confirmation of community no-objection to the identified market site.
- Discussion on community contributions and project recommendations.

Additional Issues Raised During Consultation

The community and project team discussed the importance of the livestock market in improving livestock trade, productivity, and livelihood opportunities. The project is expected to enhance local economic development and provide a safe trading environment for pastoralists and traders.

Community members confirmed their **no-objection** to the identified government-owned site and emphasized the need for proper documentation to avoid future land disputes. Community representatives also highlighted the importance of transparent implementation and inclusive participation, particularly for women, youth, and vulnerable groups.

Agreed Agendas/Issues

- The community expressed formal no-objection to the identified livestock market construction site.
- The site is confirmed as government-owned land and free from private claims.
- Community contributions and recommendations will be respected during project implementation.
- Inclusive market opportunities will be promoted for women, youth, and vulnerable groups.
- Continuous stakeholder engagement will be maintained throughout the project cycle.

Disagreed Agenda/Issues

- No unresolved disagreements were recorded.

Consultation Ended Time: 1:00 PM**Consultation Facilitators:**

1. Ismail Ali Mohamed – Social Safeguard Specialist
2. Abdi Noor Shobaay – Environmental Safeguard Specialist
3. Shamso Abdulkhadir Dahir-GBV Specialist

Annex 6: Community Engagement Meeting Attendance Sheet



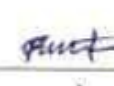
Ministry of Livestock, Forestry and Range

Attendance Sheet: Stakeholders Who Attended the Consultation Meeting Held For the Assessment and Design of the Dhoobley Livestock Market

Location: Dhoobley District

Date: 15/09/2025

S/N	Name	Gender	Institution/ Organization		Signature
1	Mohamud Abdi Isma	m	Lead Engineer Kulmuye		
2	Abdi Nur Shobay Ali	m	Environment specialist SPCU-JSS		
3	Dr. Osman Ahmed Hassan	m	Veterinary Specialist MoLFR		
4	Hasan Macali	m	Isuduuwa ho DKB: MoLFR		
5	Hasan Cabdi Keesi	m	Guidomayal Dhoobley		
6	Sulub Cabdi Nur	m	Gr. Sumaya		
7	Mohamud Shariye Koo	m	Nabadcon		
8	Abdi Ahmed Suguo	m	Dilaal		
9	Dalabo Omar Gurey	F	Ganaasatu		

10	Mohamed Abdi Ahmed	m	ODay		
11	Hussien Abdi Ahmed Ibrahim	m	Dr. Xooladay		
12	Sahra Xuseen Axmed	F	Ganaasido		SAHRA
13	Farxiya Abolulahi Xuseen	F	Ganaasido		
14	Liibaan Ali Maxamed	m	Ganaasido		
15	Siyaad Axmed basir	m	Dilaal		
16	Calmi Xurayce Ali	m	Dilaal		
17	Xamdi Sugute Axmed	F	Dr. Xoolah		
18	Faysa Ismaaciil Axmed	F	Ganaasido		FAYSA
19	Aamina Ismaaciil Omar	F	Xoolaley		
20	Omar Abdi Mohamud	m	ururke Dholinyaro		
21	Muhammed Wacdi Maxamed	m	G. X Xoolalay		
22					
23					
24					

Annex 7: Government Land Ownership Documents



Jubbaland State of Somalia

Ministry of Agriculture and Irrigation

Office of Social Safeguard, FSRP project

Date: 28/09/2025

Subject: Government Owned Land for Public Use

After consideration of the letter dated: 5th Sept 2025 and titled “Codsí Bixin Dhul Dan-guud” from the Ministry of Livestock, Forest and Range of Jubbaland State, as the district commissioners of Dhobley district, we have donated land located in **GPS: -Latitude 0.388388 Longitude 41.00166** in the village of Danwadaag, Dhobley. We hereby testify that we are donating government owned land to the Ministry of Livestock, Forest and Range of Jubbaland State for Public use only (construction of Livestock Market).

The Measurements of the land that we are donating are as follows:



Hence, this notary serves as a legal document affirming that we have donated the above stated land for public use, which will be used for construction livestock market for the **Somali Food System Resilient project** being implemented by Ministry of Agriculture and Irrigation and Ministry of Livestock, Forest and Range of Jubbaland State.

Undersigned is name of land area village chairman in sound mind

1. Name e Muhamed Wacdi Muhamed Sign:

Aug 061

Acknowledgment

I, Hassan Abdi Hanshi, chairman of the Dhobley District affirms in this legal document that we accept the land donated for public use from the above signed users(s) of the land located Danwadaag Village with the measurements stated above.

Undersigned is the name of the chairman of the district in sound mind .

Name: Hassan Abdi Hanshi sign:  28

Witnesses

1. Name Mukhtar Maxed Sahal Tel: 0615928758
Sign:  Date: 28/09/25
2. Name Aden Ali Ibrahim el: 06152 7805
Sign:  Date: 10/9/2025



DOWLAD GOBOLEEDKA JUBBALAND EE SOOMAALIYA

دولة إقليم جوبالاند الصومالية

Jubaland State of Somalia

Maamulka Degmada Dhobley

بلدية طوبلي



DHOBLEY DISTRICT ADMINISTRATION

Tixraac/GD/DHOB/DGJS//161/2025

Taariikh:28/09/2025

UJEEED: CADAYN LAHAANSO DHULEED.

Xafiiska Dowladda Hoose ee Degmada Dhoobley wuxuu caddeynayaa inuu si rasmi ah u wareejiyey dhul dan guud ah oo cabirkiisu dhan yahay 15,000 mitir oo laba jibbaaran, kuna yaalla Xaafadda Danwadaag ee magaalada Dhoobley.

Dhulkan waxaa la siiyey Wasaaradda Xananada xoolaha, Dhirta iyo Daaqa ee Dowlad Goboleedka Jubbaland, iyadoo loo oggolaaday in si lacag la'aan ah loogu dhiso suuqa xoolaha.

Dhulkan waxa uu leeyahay xogta GPS-da ee soo socota:

Latitude: 0.388388, Longitude: 41.00166.

JIIHOYINKA BOOSKA/DHULKA

Bari : Banaan Cidla

Galbeed : Wado

Waqooyi : Danwadaag

Koonfur : Midnimo

Sidaas darteed, laga bilaabo maanta oo ay taariikhdu tahay **28 Sebteembar 2025**, milkiyadda dhulkan waxaa si buuxda u leh Wasaaradda Xananada Xoolaha, Dhirta iyo Daaqa Jubbaland.

Gudoomiyaha Degmada Dhoobleeey

Xassan Cabdi Xaashi

Telefoon: +252615255600



Saxiixa:.....

CONTACT US:

Dhobley, Jubaland State, Dhobley District, Email:dhobleydc1@gmail.com / Tell +252615255600

Annex 8: Grievance Mechanism (GM) Tools and Templates

This annex summary presents the grievance process, reporting channels, and key contacts for the Dhobley Agriculture Market Construction under S-FSRP. Stakeholders may submit complaints at any time, anonymously or openly. The GRM flows these steps:

- ✦ **Step 1 – Submit a Complaint (Any Channel):** Complaints may be submitted verbally or in writing through community Committee leaders, the contractor, MOAI field officers, the State SPCU, or the toll-free numbers. SEA/SH cases bypass local structures and go directly to the SPCU GBV Specialist.
- ✦ **Step 2 – Register and Acknowledge:** The Jubaland State SPCU Social Safeguard Specialist registers all complaints and acknowledges receipt (normally within 48 hours). Initial screening determines whether the issue can be resolved immediately or requires escalation.
- ✦ **Step 3 – Assess and Resolve:** The State SPCU, MOAI, and contractor collaborate to investigate and resolve issues—typically within 7–14 days. Technical issues may be escalated to NPCU if needed.
- ✦ **Step 4 – Close or Escalate:** If a resolution is accepted, the case is closed. If the complainant is not satisfied, the grievance may be escalated to NPCU and ultimately to the World Bank's GRS for serious cases.

Table 14: GM Contact List (Project, State and National)

Table 14: GRM Contact List (Project, State and National)

Level	Contact Person / Office	Contact Details	Notes
Project Level	District Development Committee Chairperson (DDC)	Local contacts	First point of intake
State SPCU – Jubaland MoAI	Ismail Ali Mohamed-Social Safeguards Shamso Abdulkhadir Dahir GBV Specialist	Email: jubbalandgrm@gmail.com Email: jubbalandgbv@gmail.com Hotlines: 560 (toll-free)	State-level GRM & GBV focal points
National PCU – MoAI-FGS	National FSRP GRM Secretariat	Hotlines: 570 / 540 (toll-free)	National escalation channels

Table15: GM Intake/register

GRM Code	Date Received	Complainant (Optional)	Location	Issue Summary	Category	Action Required	Responsible Unit	Status	Date Closed	Notes

SEA/SH Survivor-Centered Referral Pathway

This pathway ensures survivors can report safely and confidentially, without fear of retaliation or exposure. No personal details or written statements are required.

1. Safe and Confidential Reporting Options

Survivors may report directly to:

- State SPCU GBV Specialist (confidential inbox): [/jubbalandgbv@gmail.com](mailto:jubbalandgbv@gmail.com)
- National Project Coordination Unit: gbv@fsrp.gov.so

Note: SEA/SH cases **must not** be reported through community leaders or recorded in public registers.

2. Immediate Safety and Support

The GBV focal point ensures:

- Immediate safety assessment
- Confidential conversation
- No personal identification recorded
- Referral to local service providers (health, psychosocial, case management)
- SEA/SH cases are not mediated with alleged perpetrators and are kept separate from the general GM

3. Coordination and Follow-Up

NPCU and the State SPCU coordinate discreetly to ensure the survivor receives assistance. No project staff investigate SEA/SH cases are treated strictly through survivor support and professional services.

4. Accountability Measures

The contractor must:

- Remove any implicated workers
- Retrain all personnel on the Code of Conduct
- Reinforce SEA/SH prevention during toolbox meetings
- Immediately remove any implicated workers from the site pending investigation.
- Apply contractual sanctions, including termination, in line with the Code of Conduct and national law.
- Report SEA/SH allegations promptly through confidential channels to the SPCU/GBV focal point.
- Ensure non-retaliation against complainants and witnesses.

Annex 9: Contractor Monthly ESHS Report Template

Project Information

Item	Details
Project Name	Dhobley Livestock Market Construction Project
Reporting Period	
Contractor	
Location	Dhobley, Afmadow District, Jubaland State
Report Prepared By	
Date of Submission	

Workforce Statistics

Category	Male	Female	Total
Skilled Workers			
Unskilled Workers			
Local Workers			
Non-Local Workers			
Total Workforce			

OHS Statistics

Indicator	Number
Hours Worked	
First Aid Cases	
Medical Treatment Cases	
Lost Time Injuries (LTI)	
Fatalities	
Near Misses	
Toolbox Talks Conducted	

Grievance Summary

Category	Received	Resolved	Pending
Environmental			
Social			
Labor			
Traffic Safety			
Other			

Annex 10: Site Inspection Checklist

Item	Yes	No	Remarks
ESMP available on site			
Workers using PPE			
First Aid Kit available			
Waste properly segregated			
Dust suppression implemented			
Noise control measures implemented			
Traffic signs installed			
Community safety measures in place			
GBV Code of Conduct signed			
Grievance log available			
Site free from environmental pollution			

Incident/Near-Miss Form

Item	Details
Incident Reference Number	
Date and Time	
Location	
Type of Incident	
Description of Incident	
Immediate Actions Taken	
Persons Affected	
Root Cause	
Corrective Actions Required	
Reported By	
Date Reported	
Follow-Up Status	