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XOOLAHA, Dhirta iyo Daaqa



جمهورية الصومال الفدرالية
حكومة إقليم جلمدج
وزارة الثروة الحيوانية

SOMALI FEDERAL REPUBLIC
Galmudug State of Somali
Ministry of Livestock, Forestry
and Range

CLUSTERED ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

REHABILITATION AND UPGRADING OF LIVESTOCK MARKETS

In
ADADO, GALKAYO & GURIEL DISTRICTS
For
The Ministry of Livestock, Forestry and Range (MOLFR)

Submitted by:
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Submitted to
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List of Abbreviations and Acronyms

ABBREVIATION/ ACRONYMNS	FULL TERM
BoQ	Bill of Quantities
C-ESMP	Contractor's Environmental and Social Management Plan
E&S	Environmental and Social
EHSG	Environmental, Health, and Safety Guidelines
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FGS	Federal Government of Somalia
GBV	Gender-Based Violence
GM	Grievance Mechanism
LMP	Labor Management Procedures
MoLFR	Ministry of Livestock, Forestry and Range
SPCU	State Project Coordination Unit
OHS	Occupational Health and Safety
PAP	Project Affected Person
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
SEAH	Sexual Exploitation, Abuse, and Harassment
SEP	Stakeholder Engagement Plan
WB	World Bank
WMP	Waste Management Plan
ESMF	Environmental and Social Management Framework
GIIPs	Good International Industry Practices

1. EXECUTIVE SUMMARY

The World Bank's funded Somalia Food systems Resilience Project (S-FSRP) under component 3, getting to markets supports the rehabilitation and upgrading of three livestock markets in Adado, Galkayo and Guriel districts. It aims to improve livestock trade infrastructure, enhance market accessibility, strengthen livelihoods and promote safe and sustainable livestock marketing systems for pastoral and agro-pastoral communities. The subproject is designed to rehabilitate or construct critical livestock infrastructure to support the livestock sector.

Key components to be rehabilitated/upgraded include Fencing walls, External washrooms, Animal trading holding shed, Loading and offloading ramps, Fodder storage units and Offices and prayer spaces while some other key facilities including Waste dumping pits, Elevated water tanks and animal water troughs will be constructed. These interventions are expected to improve market functionality, support local economic growth, increase livestock trade opportunities and enhance resilience of vulnerable households that depend on livestock production and marketing.

The subprojects' sites coordinate:

- **Adado:** (6.144023, 46.617758),
- **Galkayo:** (6.755189, 47.417791) and
- **Guriel:** (5.303502, 45.885099)

Environmental risks from rehabilitation works are site-specific, temporary and manageable in line with the World Bank ESF and national regulations. Key risks include dust, noise, construction waste, soil erosion, wastewater discharge and occupational health and safety hazards. Mitigation measures include water sprinkling, proper waste management, use of PPE, phased upgrading, site rehabilitation and implementation of ESMPs.

Social risks include temporary disruption of market activities, labour influx tensions, exclusion of vulnerable groups, occupational accidents, community health and safety concerns and resource-use conflicts. These will be addressed through stakeholder engagement, grievance mechanisms, fair labour practices, community awareness and inclusion of women, youth, IDPs and vulnerable groups. GBV/SEA/SH risks are moderate and will be mitigated through Codes of Conduct, worker training, confidential reporting systems, survivor-centred response mechanisms, contractor monitoring and inclusive community engagement.

Once rehabilitation and upgrading works are completed, the sustainability of the markets will be ensured through joint responsibility of the State Ministry of Livestock, district authorities, and market management committees. In addition, strong community ownership and engagement will be essential to support the long-term effective and smooth operation of the markets.

2. INTRODUCTION

Livestock production is the backbone of the economy in Galmudug State, particularly in the subproject target districts; Adado, Galkayo and Guriel, where pastoralism and agro-pastoralism are the primary livelihoods for the local populations. Livestock markets play a critical role in facilitating trade, income generation and food security for local communities. The three livestock markets targeted under this intervention were initially constructed through different development initiatives. The Adado livestock market was established under the Barwaaqo Project funded by the World Bank, the Galkayo livestock market under the Resilient Fisheries and Livestock Value Chain for Inclusive and Sustainable Growth (RAAISE) Project and Guriel livestock market under the Building Resilient Communities in Somalia (BRCiS) Project. However, due to financial limitations during implementation, the construction works were not fully completed, leaving several critical infrastructure components either partially developed or non-functional.

Under component three of the Food Systems Resilience Program (FSRP), strengthening livestock market infrastructure is considered essential for improving livestock value chains, enhancing resilience and promoting sustainable livelihoods. The proposed rehabilitation and upgrading of the three livestock markets therefore represents a strategic intervention aimed at completing unfinished works and improving essential facilities to ensure that the markets operate efficiently, safely and sustainably.

The implementation of this subproject will be led by the Ministry of Livestock, Forestry and Range (MoLFR) of Galmudug State, Somalia, in close collaboration with the State Project Coordination Unit (SPCU) and key market stakeholders. These stakeholders include livestock traders and brokers, pastoralists and agro-pastoralists, livestock cooperatives and market associations, transporters, small business owners, as well as women and youth engaged in livestock trade and related services. Effective coordination with district authorities and municipal institutions will be essential throughout the implementation process to ensure smooth execution, alignment with local governance structures and the sustainability of project outcomes.

The rehabilitation and construction activities will be carried out in full compliance with the project's Environmental and Social Framework (ESF), as well as the relevant Environmental and Social Standards (ESS) and applicable World Bank guidelines. In addition, all activities will adhere to national and state-level laws, regulations and policies to ensure that the works are implemented responsibly, safely and in a manner that protects both people and the environment.

3. THE ESMP PURPOSE AND SCOPE

The purpose of this Environmental and Social Management Plan (ESMP) is to ensure that the rehabilitation and upgrading of the livestock markets in Adado, Galkayo & Guriel is implemented in an environmentally friendly and socially responsible manner.

Specifically, the ESMP aims to:

- Prevent, minimize or mitigate adverse environmental and social impacts throughout subproject lifecycle;
- Ensure compliance with the project’s Environmental and Social Framework (ESF), relevant Environmental and Social Standards (ESS), and applicable national and state regulations;
- Promote safe working conditions and protect the health and safety of workers, traders and surrounding communities;
- Enhance positive project outcomes, including improved market functionality, livelihoods and access to services for pastoralists, traders, women and youth, and
- Establish clear institutional roles, responsibilities and monitoring mechanisms for effective ESMP implementation.

This clustered ESMP provides a structured framework to identify, assess and manage potential environmental and social risks and impacts associated with the subproject works.

Environmentally, rehabilitation, upgrading and construction activities may generate dust, noise, waste and wastewater, as well as cause soil disturbance; to mitigate these impacts, water will be regularly sprinkled on exposed surfaces and roads to control dust, and noisy activities will be limited to daytime hours. Solid waste will be managed through provision of collection bins and routine disposal at designated and approved sites, while wastewater will be properly managed to prevent contamination of surrounding areas. Excavated soil will be stockpiled in designated locations and reused where possible to minimize land degradation. In addition, manure management systems, including designated collection and disposal or composting areas, will be introduced to maintain cleanliness and reduce environmental pollution, alongside awareness efforts to promote improved hygiene practices within the market.

In social context, the project may cause temporary disruption to market activities, access restrictions, and potential exclusion of vulnerable groups; to address this, construction and rehabilitation works will be phased to allow continued market operations and temporary trading spaces will be provided for affected livestock traders. Clear and safe access routes for traders, livestock, and transporters will be maintained at all times, and continuous engagement with local leaders, trader associations, and cooperatives will be ensured. Local labour will be prioritized to enhance economic benefits and reduce labour influx risks, while transparent processes will be

established for the allocation of rehabilitated market spaces. Special attention will be given to the inclusion of women and youth in consultations, employment opportunities, and access to facilities, supported by community awareness initiatives on project activities and safety.

On the other hand, risks of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) may arise during project implementation; therefore, a strict Code of Conduct will be developed, signed and enforced for all workers, clearly outlining prohibited behaviours and consequences. Mandatory awareness and sensitization sessions will be conducted for both workers and community members to promote respectful behaviour and a zero-tolerance culture. A confidential, accessible and survivor-cantered Grievance Mechanism (GM) will be established with multiple reporting channels, and trained GBV focal points, including female personnel will be assigned. Private sanitation facilities for women and girls, and referral pathways will be established with local service providers to ensure timely support for survivors.

Regarding Occupational Health and Safety (OHS), the rehabilitation and construction activities present risks of worker, market traders and livestock injuries and unsafe conditions; to mitigate these, all workers will be provided with and required to use appropriate Personal Protective Equipment (PPE) such as helmets, gloves, boots and reflective vests. Regular safety training, including daily toolbox talks, will be conducted to reinforce safe practices, and warning signs and barricades will be installed around hazardous areas. Construction materials and equipment will be safely stored and handled, and access to the site will be restricted to authorized personnel only. Fully equipped first aid kits will be deployed on-site, with trained personnel available to respond to incidents, and clear emergency response procedures will be established and communicated. Routine safety inspections will be carried out to ensure compliance and address risks promptly.

Overall, this Environmental and social Management Plan (ESMP) serves as a practical tool to guide the sustainable rehabilitation and upgrading of the Adado, Galkayo & Guriel livestock market while safeguarding the environment and improving social outcomes. The plan ensures the full compliance of the world bank guidelines including approved Environmental and social frameworks and relevant standards as well as national and state policy regulations.

4. METHODOLOGY

The preparation of this ESMP for the rehabilitation and upgrading three livestock markets followed a systematic approach aligned with the S-FSRP Environmental and Social Management Framework (ESMF), the World Bank Environmental and Social Framework (ESF), and relevant national regulations, including the Environmental Protection and Management Act (2024), ESIA Regulations (2024), and the Somalia National Climate Change Policy (2023). The methodology

integrated desk review, field assessments, stakeholder engagement, risk analysis and validation, with emphasis on site-specific analysis, inclusivity and climate sensitivity.

The methodology used in the development of this ESMP include:

4.1. Spatial analyses and site differentiation

A spatially differentiated approach was applied to assess the three geographically distinct sites independently. Each site was analysed based on settlement patterns, land use, proximity to sensitive receptors, accessibility and exposure to risks such as drought, flooding and extreme heat. This enabled comparison across sites and ensured tailored mitigation measures. Site differentiation analyses facilitated the team to make a good selection for which these markets are proposed to be supported. The decision of clustering the ESMP was made on the basis that the rehabilitation of the livestock markets in Galkayo, Adado, and Guriel involves similar activities, existing market footprints, and comparable risks to soil and land, surface and groundwater, air quality, noise, waste management, biodiversity, occupational and community health and safety, traffic, livelihoods, livestock, and other community receptors. The three sites therefore require largely consistent mitigation, monitoring, and management measures. The clustered ESMP will also capture site-specific environmental and social conditions, sensitive receptors, and stakeholder concerns at each location, ensuring adequate risk management while avoiding duplication and maintaining compliance with the World Bank ESF and project ESMF.

4.2. Desk Review

A comprehensive desk review was conducted to establish the regulatory and baseline context. Documents reviewed included the S-FSRP ESMF, the previous construction works by other projects, screening tools, project designs, land ownership records, municipal approvals and relevant national environmental and climate policies. The review informed risk identification and field data collection design.

4.3. Site assessment and observations

Field assessments were conducted by the State Project Coordination Unit (SPCU) safeguards team in collaboration with the Ministry of Livestock, Forestry and Range (MoLFR), local authorities and agropastoral cooperatives. Activities included verification of land ownership, baseline environmental and social assessment, identification of sensitive receptors and vulnerable groups, GPS mapping and photographic documentation. Each site was assessed separately to ensure site-specific analysis.

4.4. Data Collection

Both qualitative and quantitative methods were applied, including structured checklists, key informant interviews, focus group discussions and direct observations. Women only FGDs were

conducted to understand issues affecting women. Data covered environmental, social, SEA/SH and economic conditions. Occupational Health and Safety (OHS) risks were identified using hazard checklists and worker safety assessment tools.

4.5. Stakeholder mapping

A stakeholder mapping exercise was conducted to identify all relevant actors involved in the project. Stakeholders were then categorized based on their levels of influence and interest in the rehabilitation, construction and operation of the livestock markets. The exercise identified local communities in the three target sites including youth, women, elders, clan leaders, livestock traders, herders, agropastoral cooperatives and district reps for the ministry, as the primary stakeholders. These groups are directly affected by the subproject and will play a central role in its utilization, ownership and sustainability.

The secondary stakeholders were identified as the relevant line ministries and local administration structures. These actors are primarily responsible for oversight, coordination, technical guidance and ensuring alignment with government policies and regulatory frameworks. Overall, the mapping underscores the importance of strong community engagement alongside institutional coordination to ensure effective implementation and long-term success of the livestock market.

4.6. Community Consultations meetings

Following the completion of the environmental and social screening assessments and stakeholder mapping exercise, community consultation meetings were conducted between April 30 and May 4, 2026. The consultations brought together key stakeholders, including local communities, livestock keepers, traders, representatives from the Ministry of Livestock, Forestry and Range (MoLFR), district and municipal authorities, traditional leaders and vulnerable groups such as women, youth, internally displaced persons (IDPs) and the elderly. A total of 56 community reps including 19 women and 37 men have been consulted with the three project sites.

Consultations were conducted separately for each project site, with an average of two sessions per site. The engagement process included public consultation meetings, focus group discussions (FGDs), and institutional stakeholder engagements to ensure broad participation and inclusive feedback.

The consultations incorporated gender-sensitive and GBV/SEA/SH risk-aware approaches. Separate discussions were held exclusively with women to create a safe and comfortable environment for open participation. Culturally appropriate engagement methods, including

women facilitating and leading discussions with women participants, were applied to encourage meaningful contributions and safeguard confidentiality and dignity.

Key risks identified during the consultations included labour influx, harassment, social exclusion and unequal access to project benefits. These concerns, together with the recommendations and feedback received from stakeholders, have been incorporated in this ESMP.

4.7. Risk Screening and Analysis

Using the bank approved screening template, covering all subproject related environmental and social standards, the Environmental and social safeguards team utilized the S-FSRP E&S screening tool to categorize potential environmental and social risks and come to a conclusion classifying the subproject as Moderate Risk because the risks identified are localized, temporary, reversible and manageable with site-specific impacts.

4.8. Reporting and Validation

Findings were validated through coordination meetings with MoLFR and the Municipality together with community, ensuring alignment between technical design, safeguards compliance and community priorities. All information on potential risks and impacts was carefully triangulated using multiple, complementary sources to ensure reliability and completeness. These included inputs from community structures (such as elders and local committees), districts administrations, and technical representatives from the Ministry of Livestock, Forestry and Range, as well as direct consultations with women, pastoralists and other community members across the three sites. By cross-checking perspectives from these different groups, the ESMP reflects a well-rounded and contextually grounded understanding of the local situation. The findings presented are therefore considered robust, credible and representative of conditions on the ground.

5. Sub-project Description

This ESMP is prepared for the rehabilitation and upgrading of livestock markets in Adado, Galkayo and Guriel districts. These markets serve livestock trading hubs for Galmudug state. This is because of their strategic locations in the state. The rehabilitation and upgrading of these markets will enhance livestock trade, improve livelihoods and strengthen resilience of the target population under the support of FSRP. The market sites are georeferenced as follows, Adado (6.144023, 46.617758), Galkayo (6.755189, 47.417791) and Guriel (5.303502, 45.885099). the official land ownership certifications have been verified and attached in the annex session of this plan.

5.1. Locations

5.1.1. Adado:

The district of Adado locates very strategic position connecting Mudug and Galgaduud regions. Due it's geographical location, Adado is livestock trading hubs for pastoral and agropastoral population across many districts and villages in the surroundings. The market was previously constructed under Word-bank funded Barwaaqo project. Due to limited financial resources, key components including elevated water tank, and waste dumping pit have not been constructed. Other key critical components including the fencing wall, external washrooms and livestock trading sheds were left unfinished.

The rehabilitation and construction of these key infrastructure gaps is timely and very strategic intervention. It will improve overall functioning of the livestock market, and enhance the livelihoods of the pastoralist and agro-pastoralist, livestock traders and cooperatives. The global positioning systems of the site is referenced as (6.144023, 46.617758); and the land was public, owned and donated by the local government municipality. The official ownership certification is attached in the annex section.

Based on the screening assessments, the rehabilitation of the livestock market, potential environmental and social risks have been identified. However, these risks were site-specific, localized, reversible and manageable. Therefore, the project risk is classified as moderate. The following picture presents the site map that defines the location and its surroundings.



This map presents geographical representation of the livestock market in Adado district. It shows the location and its surroundings.

5.1.2. Galkayo

Galkayo is the capital of Mudug region. It's located at the far corner of the Galmudug state connecting Mudug districts and its surrounding villages. It has potential agricultural and livestock trading hubs for pastoral, agropastoral and transporters. A very strategic livestock market was previously constructed under support of BRICs project implemented by FAO. Due to financial constraints, some key components such as animal holding sheds, elevated water tank, animal water trough and waste dumping pit were left unconstructed. Others such as livestock trading sheds, external washrooms, loading/offloading and the entry gate, need critical rehabilitation.

Construction of the new components and the upgrading of areas for rehabilitation is a significant intervention for Galkayo livestock market. It improves the lives and the livelihoods of pastoral, agropastoral and livestock traders. The global positioning systems of the site are referenced as (6.755189, 47.417791). the land was public, owned and donated by the local government municipality. The official ownership certification was received, reviewed and verified. It is attached in the annex section of this plan.

The screening assessment report revealed environmental and social risks. these risks were site-specific, localized, manageable and reversible risks with moderate and lower impacts. site-mitigation mitigation measures such regular community engagement, workers training and sensitizations session, constant use of standard PPEs and grievances mechanism accessible to all workers and adjacent community will be maintained throughout the implementation of this subproject. To prevent economic ad physical displacements, the project avails available spaces and currently unused structures within the market. Therefore, phased rehabilitation/construction of the project activities will be prioritized to implement across subproject lifecycles. Parallellly, community and livestock market engagement and consultation will continue throughout to ensure project recipients are centre of the project. For pest and pesticides, trained vet doctors will be deployed to the worksites to ensure maximum prevention and mitigation of zoonotic and livestock diseases. They do livestock inspections at the entry gates of these markets, conduct community and workers awareness prevent and fight against pests such as files, mosquito and ticks.



This map presents geographical representation of the livestock market in Galkayo district taken during screening assessment. It shows the exact location and surrounding environment.

5.1.3. Guriel

Guriel is the most populated district in Galgaduud region. It has the most villages and towns surrounding it. These villages and towns economically depend on livestock and farming practices. Norwegian Refugee Council (NRC) with Resilient Fisheries and Livestock Value Chain for Inclusive and Sustainable growth in Somalia (RAAISE) project Implemented by Food and Agricultural Organization of the United Nations (FAO) previously constructed a 100m x 100m livestock market within the district. Most of the strategic infrastructures of the market had been constructed under that project; but due to the long-term utilization and lack of maintenance, most of the key components such as fodder storage unit, fencing wall, trading sheds, water troughs, loading/offloading ramps and waste dumping pit have deteriorated considerably. Consequently, these components require critical upgrading and rehabilitation works. Despite unfinished parts and the deteriorations of some others, the site is currently operational. However, the rehabilitation complements the unfinished and missing parts of the market thus, improving sustainability, increase income generation for the traders and enhance overall livestock marketing efficiency.

The global positioning systems of the site is referenced as (5.303502, 45.885099). The land was public, owned and donated by the local government municipality. The official ownership certification was received, reviewed and verified. It is attached in the annex section of this plan.

The screening assessment report revealed potential environmental and social risks impacts. These include workers' influx, dust and noise affecting the nearby families, temporary movement restrictions. Only minor site-specific, localized, manageable and reversible risks with moderate and lower impacts have been identified. Appropriate mitigation measures such as phased renovation approach, regular engagements with community families nearby, use of PPEs and deployment of security personnel for controlled access will be implemented during the subproject lifecycle. Therefore, the impact of this subproject is classified as moderate. The map of the existing market is presented in this report.



5.2.Subproject components per district

District	Proposed Rehabilitation works	Proposed Construction works
Adado	General rehabilitation works including animal trading sheds.	Construction of Waste dumping pit/site
	Rehabilitation of boundary wall (height extension)	Construction of Animal water troughs
	Rehabilitation of External washrooms	Construction of RCC elevated water tank (30cum)
Galkayo	Rehabilitation of boundary wall	Construction of Waste dumping pit/site
	Renovation of storage unit	Construction of Animal holding sheds
	Rehabilitation of livestock trading sheds	Construction of RCC elevated water tank (30cum)
	Renovation of loading/off-loading ramps	Construction of water troughs for sheep/goats.
	Rehabilitation of External washrooms	Construction of Waste dumping pit/site

Guriel	Rehabilitation offices and painting	Construction of water troughs for sheep/goats
	Rehabilitation of boundary wall (main gates, small gates & etc.)	
	Rehabilitation livestock trading sheds (chain-link fence installation & metal access doors)	
	Renovation of Animal holding sheds	
	Renovation of elevated water tank	
	Renovation of loading/off-loading ramps	
	Renovation of existing gender segregated latrines.	
	Rehabilitate portion of the wall for the Masjid and the Lab.	

As indicated in the table above, the subproject is not merely construction, rather it includes renovation and construction of some structures, therefore, no alternative sites will be considered. the plan is to implement the subproject in a phased and controlled approach ensuring business continuity throughout.

Subproject Beneficiaries: The rehabilitation and construction of livestock markets will benefit a total of approximately 180,000 households at the 3 proposed sites, mostly pastoralists and agro pastoralists.

Worker composition and origin: Local workers will be prioritized to ensure project benefits them most. Approximately 62 workers, for the 3 sites, including skilled and unskilled personnel will be engaged in this project, including:

- Unskilled workers: 39
- Skilled workers: 17
- Engineers: 6

5.3.Sites Accessibility

These markets are strategically located within the towns and are well connected through multiple access roads linking both urban centres and surrounding rural communities. The road networks leading to and from the markets are generally accessible throughout the year, facilitating the

smooth movement of livestock traders, contractors, suppliers and community members. As a result, accessibility challenges are expected to be minimal during the implementation and operation of the market rehabilitation activities.

5.4. Project alternatives

In line with the World Bank Environmental and Social Framework (ESF), different project alternatives were carefully assessed before selecting the final approach for the rehabilitation and upgrading of the livestock markets in Adado, Galkayo and Guriel. The assessment process considered both technical and socio-economic factors to ensure that the selected interventions respond to the practical needs of pastoral and agro-pastoral communities that depend heavily on livestock production and trade for their livelihoods. Key considerations included accessibility, land ownership status, environmental and social safety, cost-effectiveness, population density, strategic market location and the views and acceptance of local communities and authorities.

The “no project” alternative was also considered during the assessment process. Although this option would avoid temporary environmental and social risks associated with rehabilitation and construction activities, it would leave the existing livestock markets in their current poor condition, with inadequate infrastructure, poor sanitation, limited water access and insufficient market facilities. Given the central role of livestock markets in supporting household incomes, trade, food security and local economic growth, the no-project option would likely contribute to continued economic losses, reduced market functionality, poor hygiene conditions and increased vulnerability among livestock-dependent communities. Therefore, this option was not considered viable.

Alternative intervention options were further discussed with local communities, district authorities, market committees and relevant government stakeholders. Rather than establishing entirely new market sites, the preferred option focused on rehabilitating and upgrading the existing livestock markets due to their strategic locations, established accessibility routes, existing land ownership arrangements and strong community preference. The proposed interventions aim to improve and complete critical market infrastructure, including market sheds, drainage systems, water points, sanitation facilities, waste management areas, livestock holding grounds, and internal access routes.

Therefore, the selected approach was considered the most practical, environmentally and socially acceptable, and economically feasible option, as it builds on already existing market structures while minimizing land acquisition risks, community displacement, and environmental disturbance. Moreover, the rehabilitation and upgrading of the existing livestock markets will improve market operations, enhance livestock trade, strengthen resilience of pastoral communities, and support sustainable local economic development across the target districts.

6. ENVIRONMENTAL AND SOCIAL BASELINE CONDITIONS

This section presents the baseline conditions of the proposed sites for the rehabilitation and upgrading of livestock markets in the selected districts. It examines the existing environmental and social setting to identify potential environmental and social (E&S) risks and impacts and to inform the development of site-specific mitigation measures, ensuring that project implementation is aligned with the local social and ecological contexts. The baseline information is derived from screening assessments and observations, key informant interviews using checklists, community consultation meetings, and a review of the project's approved Environmental and Social Frameworks (ESF).

6.1. Spatial differentiations of the three sites

Adado livestock market is located in an urban area with scattered settlements and with road connectivity, which facilitates accessibility throughout year. The surrounding grazing environment increases risks of livestock waste accumulation, environmental contamination, and human–livestock interaction if proper drainage and waste management systems are not incorporated into the rehabilitation works.

Galkayo livestock market is located in a mixed pastoral and semi-urban environment with relatively better access to services. However, rehabilitation works may increase pressure on water resources, grazing land, and existing waste management systems, requiring improved sanitation, drainage, and environmental management measures.

Guriel livestock market is situated in an urban setting with improved road infrastructure and accessibility. There is increased livestock concentration that could heighten sanitation and waste management risks if not properly managed. Therefore, rehabilitation works will support full functionality and sustainability of the market operations.

6.2. Meteorology and climate

Climatically, all three districts experience a semi-arid conditions defined by high temperatures, low and erratic rainfall, and strong seasonal variability. The climate follows two distinct seasons: *Jiilaal* and *Xagaa* as prolonged dry periods, and *Gu'* and *Deyr* as the main rainy seasons. Annual rainfall generally remains below 300 mm in all sites, while temperatures range between 30°C and 37°C. However, according to the climate assessments conducted, vulnerability to climate-related risks varies across the three sites.

- **Adado** is more exposed to strong winds and dust storms, particularly because of its open landscape and proximity to livestock routes.

- **Galkayo** experiences intensified heat stress and dust accumulation due to dense settlement patterns and limited vegetation cover.
- **Guriel** is relatively advantaged during rainy seasons due to temporary surface water availability but is also prone to flooding, soil saturation and contamination risks associated with stagnant water.

6.2.1. Soil

Soil conditions across the three sites are generally characterized by sandy loam soils typical of semi-arid environments, though with notable local variations.

- In **Adado**, soils show signs of localized contamination due to prolonged human and livestock activity, combined with poor waste disposal practices.
- In **Guriel** soils are relatively stable but are susceptible to wind erosion due to sparse vegetation cover.
- In **Galkayo**, soils tend to retain more moisture during the rainy seasons, which increases the risk of waterlogging and potential pathogen accumulation. While no major industrial contamination was identified, the absence of formal waste management systems across all sites presents a growing environmental concern.

6.2.2. Air Quality and Noise Levels

A contextual review of air quality and noise conditions in Guriel, Adado and Galkayo suggests that these towns currently experience moderate but growing environmental stress, driven more by rapid urbanization, dust, waste burning, traffic growth, diesel generators and weak urban planning rather than by heavy industry.

- In **Adado** livestock market, strong winds and dust storms frequently affect air quality and disrupt market operations. The open market setting and limited wind protection expose the area to significant dust and noise impacts, while heavy winds have previously damaged infrastructure, including trading sheds. Noise levels are high during peak trading periods due to livestock concentration, traders and vehicle movement.
- In **Guriel** livestock market, air quality is affected by livestock movement, transport activities and seasonal winds that spread dust across the market. Odors from accumulated animal waste are occasionally experienced in congested areas with limited waste management. Noise levels are moderate to high during active trading days because of animal sounds, loading and offloading activities, vehicles, and market gatherings.
- In **Galkayo**, livestock market, air quality in peri-urban areas is estimated at around 15–20 $\mu\text{g}/\text{m}^3$, which remains below many international emergency thresholds but may still affect vulnerable groups over time. The market's perimeter fencing wall helps reduce external winds and limits dust dispersion; however, dust from livestock and vehicle movement

remains common during dry periods. Noise levels are relatively high due to transport operations, commercial activities and livestock trading, although the organized market layout helps reduce disturbance to nearby communities.

6.3. Biological Environment

6.3.1. Fauna

Across the three districts, the fauna is typical of a semi-arid rangeland ecosystem, dominated by livestock such as camels, goats, sheep and cattle, which form the backbone of local livelihoods. Wildlife presence is limited but includes small mammals (e.g., hares and rodents), reptiles and bird species adapted to dry conditions. Guriel and Galkayo show relatively higher bird activity due to slightly denser vegetation, while Adado has more reduced wildlife presence due to settlement concentration and grazing pressure.

6.3.1. Flora

Vegetation across the three districts is characterized by drought-resistant species common to arid and semi-arid lands. Dominant flora includes *Acacia* species (notably *Acacia tortilis*), scattered shrubs and seasonal grasses. Guriel and Galkayo exhibit relatively denser vegetation cover, particularly during the rainy season, while Adado shows more degraded vegetation due to higher human activity and overgrazing. Overall, vegetation availability is highly seasonal and influenced by rainfall variability.

6.4. Socio-economic Environment

6.4.1. Demographic Characteristics

Guriel, Galkayo and Adado are urban areas whose socio-economic structure is closely linked to the surrounding agropastoral and pastoralist communities. The three districts are administratively independent and generally connected to each other and to other cities in the state. Galkayo is the city of Mudug region where major government offices such as the mayors, local councils and some ministries locate. The combined population of the villages and their adjacent rural catchment areas is estimated at approximately 529,000 people (UN, 2025).

The population across the three districts is predominantly youthful, with more than 70% under the age of 30. Livelihoods are largely based on pastoralism, with households depending on livestock production such as camels, goats and sheep. Some run small and medium business enterprises. Settlement patterns in all districts are influenced by clan-based social organization, which plays a central role in land access, participation in local decision-making, dispute resolution mechanisms, and informal social protection systems.

Only Galkayo and Adado currently host indigenous minority groups, returnees, refugees or internally displaced persons (IDPs). This is mainly due to limited infrastructure, services, and resource capacity in Guriel, which constrain its ability to accommodate additional populations.

6.4.2. *Land Tenure and Ownership*

The proposed site is public land under the jurisdiction of Guriel, Adado and Galkayo authorities, as confirmed by an official Land Ownership letter attached in the annex section. The allocation process followed local government procedures, and there are no encumbrances, disputes, or private claims associated with the land. Hence, ESS5 (Land Acquisition and Involuntary Resettlement) is not triggered. This was reinforced by the community consultation on ownership clearance. The official confirmation corticates on land ownership are attached annex section.

6.4.3. *Livelihoods and Employment*

Across the three target districts; Guriel, Adado, and Galkayo, livelihoods and employment opportunities are predominantly centred around livestock production, livestock trade, small-scale commerce, and informal economic activities. However, the scale of economic activity, income diversification, access to markets, and livelihood resilience differ significantly among the districts due to variations in infrastructure, market connectivity, population concentration, and exposure to climate shocks.

Guriel has a relatively diversified local economy compared to Adado because of its trade hub that connects Galmudug and Hirshebelle states. Livelihoods are strongly linked to livestock production and trade, including the sale of camels, goats, sheep, milk, and other livestock products. In addition, households engage in petty trade, transportation services, food vending, construction labour, and small retail businesses. The presence of humanitarian organizations, and local markets creates additional temporary and semi-permanent employment opportunities for youth and women. Remittances from diaspora families also support household income and business investments. Despite these opportunities, many households remain vulnerable to recurrent droughts, rising food prices, and unemployment, particularly among internally displaced persons and low-income pastoral and agropastoral households.

Adado is predominantly pastoral and agro-pastoral, with livelihoods heavily dependent on livestock rearing and seasonal livestock trade. Most households rely on camels, goats, and sheep as their primary source of income and food security. Employment opportunities outside livestock production are very limited, and small businesses mainly consist of tea shops, kiosks, livestock-related services, and petty trading activities. Due to its relatively remote setting and limited infrastructure, Adado experiences constrained market access and reduced economic diversification. Households are therefore highly vulnerable to climate-induced droughts, water shortages, pasture depletion, and livestock diseases, all of which significantly affect income generation and household resilience. Informal social support systems and remittances serve as important coping mechanisms during drought periods.

Galkayo functions as a major commercial and livestock trading hub linking central and northern Somalia (Galmudug & Puntland). Livelihoods in the district are more diversified due to the presence of larger markets, transportation networks, and urban economic activities. In addition to livestock trade, households engage in wholesale and retail businesses, transportation services, construction work, telecommunications, hospitality services, and cross-border trade. The district also attracts internally displaced populations and rural pastoralists seeking employment and market opportunities. Compared to Adado and Guriel, Galkayo offers relatively broader income-generating opportunities, particularly for youth and women involved in informal businesses. However, economic activities remain highly sensitive to drought conditions, livestock market fluctuations, insecurity, and rising living costs. Climate-induced droughts continue to affect livestock supply chains, water access, household purchasing power, and overall economic stability within the district.

6.4.4. Administration and Governance:

Adado is largely governed through a combination of district administration and strong traditional leadership structures. Clan elders are central in resolving disputes, managing grazing resources, and facilitating community consultations. Due to the pastoral nature of the district, customary systems are highly respected and widely used in local governance. Close engagement with local leaders is important to ensure smooth project implementation and social acceptance.

similarly, **Guriel** is governed by district authority (the district mayor and his council) overseeing governance, security coordination, and public service delivery. Traditional elders and religious leaders remain influential in community decision-making and conflict resolution. They play an important role in land management and mobilizing local participation in development activities. Coordination between government authorities, elders, and project teams is essential for effective implementation and community acceptance.

Galkayo has a more complex governance setting due to its larger population and commercial importance. Municipal authorities manage urban governance and service delivery, while traditional elders continue to support conflict resolution and community coordination. Community leaders are important stakeholders in land-related matters and local development initiatives. Strong collaboration between authorities, elders, and implementing agencies is necessary for successful and inclusive project delivery during the rehabilitation of the livestock market.

6.4.5. Social Institutions

The target districts have well-established community structures, including women's groups, youth associations, and traditional leadership systems composed of elders and religious leaders. These institutions play a vital role in local development, community mobilization, and awareness-

raising initiatives. Traditional leaders remain highly influential in decision-making processes across all these districts. Their involvement is essential for fostering community acceptance, ensuring inclusive participation, and supporting the long-term sustainability of the livestock markets during both rehabilitation and operational phases. Women, who constitute a significant proportion of the population, are central to community life and contribute across multiple areas, including small-scale trade, healthcare (such as midwifery), administrative roles, household management and market activities (livestock trading).

6.4.6. *Gender and Vulnerable Groups*

The social context is shaped by patriarchal norms that limit women's access to resources, leadership, and governance, despite their active involvement in small-scale trade and household livelihoods and being very important market actor. Vulnerable groups including female-headed households, youth, and persons with disabilities face persistent barriers to economic opportunities, public services, and effective grievance mechanisms.

There are limited possibilities of risks of gender-based violence (GBV) in Adado, Galkayo and Guriel district, including sexual exploitation, abuse, and harassment (SEAH), particularly in crowded spaces with inadequate lighting and security like IDPs in Galkayo. In line with ESS4 and ESS10, the project integrates safety measures, inclusive participation, and accessible grievance mechanisms, with a focus on women and girls. At least 30% of markets rehabilitation-related jobs will be allocated to women in appropriate roles and with flexible working hours that respect domestic responsibilities. Regular women-led or women-only meetings will be conducted to ensure empowerment and participation in line with the inclusion objective of the project.

6.4.7. *Access to Water, Energy, and Waste Management:*

Guriel experiences recurrent water shortages, particularly during prolonged dry seasons, with communities relying privately-owned water supply companies with higher costs per watt. Electricity access is limited and mainly provided by private suppliers at very high costs ~\$1 for 1kwt, while some households use small solar systems. Waste management systems remain weak, with most solid and animal waste disposed of informally around settlements. Proper waste handling and disposal measures will therefore be essential during rehabilitation and upgrading activities in coordination with local authorities and markets management committees.

Similarly, **Adado** has limited access to water, with pastoral communities depending heavily on berkads, shallow wells, and seasonal rainwater sources. Electricity coverage is minimal and mainly supplied through small private suppliers and solar systems serving affordable households and businesses. Waste management practices are largely informal, with no established municipal collection or disposal systems in place (but they try the best they can do). The project will construct a new waste dumping pit to improve waste management practices in the livestock

market as well, ensuing environmental protection measures to minimize health and environmental risks.

This dumping pit will be used as a temporary collection area for non-hazardous waste, such as feed residues, food remains, plastics, paper, and construction waste such as broken blocks and concrete. The waste will be kept in the designated pit until it is collected weekly by the district municipality and taken to the municipality's designated disposal sites. This is the normal waste collection arrangement used by the municipality for households, businesses, and other activities across the district.

Hazardous waste, such as contaminated materials, veterinary and pharmaceutical containers, animal-health waste including used needles and blades, will not be placed in the dumping pit. These wastes will be separated at source, clearly labelled, and kept in a designated and secure area within the livestock market. The municipality will collect the hazardous waste regularly/daily and take it to the designated disposal area in line with its existing waste-management practices, including controlled burning or incineration where appropriate and permitted.

Galkayo has relatively better access to water and electricity services compared to the other target districts, although shortages and service interruptions remain common in some areas. Communities access water through boreholes, berkads, private vendors, and water trucking, especially during drought periods. Electricity is mainly provided by private companies and solar systems, but affordability remains a challenge for low-income households. Waste management infrastructure is still inadequate, requiring proper waste collection, handling, and disposal measures during project activities. The subproject will construct new elevated water tanks and waste dumping pit to improve both waste management systems and access to water for the livestock markets.

6.4.8. Cultural Heritage:

During the assessment and the field visit no known cultural, historical, or archaeological heritage and other valuable arts was observed within the subproject areas. However, in accordance with ESS1, a Chance Finds Procedure will be included in the Contractor's Environmental and social Management Plan (C-ESMP) to manage any unexpected discoveries during excavation works.

6.4.9. Community Perceptions

Due to the nature and pastoralism and agropastoralism of the communities in the target districts, the rehabilitation and upgrading of livestock markets was collectively seen as significant step towards sustainability of the livestock sector. During consultation meetings and sessions, the community presented their appreciation to the proposed subproject pledging their commitment to support. They underline the importance to rehabilitate livestock markets to improve

functionality and sustainability. Community members also requested that local labour be prioritized to ensure subproject benefits goes to the local labours.

6.4.10. Security Context:

Guriel is relatively stable due to the presence of the local distracts administration, state and national forces. However, occasional security threats, clan-related tensions, and movement restrictions may still occur in surrounding rural areas. This mostly due to the clan-related revenge-induced tensions between *Xawaadle* with one end and *Mareexaan* with the other. Coordination with local authorities and market management structures remains important during rehabilitation and upgrading works.

On the other hand, **Adado** experiences periodic security challenges linked to clan disputes between *Saleebaan* and *Mareexaan*, limited security infrastructure, and instability in nearby rural areas. Local authority in close coordination with community-based security arrangements and traditional elders play an important role in maintaining local stability. Careful coordination and conflict-sensitive engagement are essential during the rehabilitation and upgrading of the livestock markets in Adado district.

Galkayo has a relatively active security presence due to its strategic commercial importance and urban population. While the district is generally accessible, security incidents related to criminal activities, clan tensions, and regional instability may occasionally occur. In Galkayo, the livestock market locates very secure and stable area where insecurity indicators have not been observed. However, close coordination with local authorities and adherence to security protocols are necessary for safe rehabilitation and upgrading activities in the market.

7. LEGAL, REGULATORY AND INSTITUTIONAL FRAMEWORKS

This section focuses on the relevant provisions of key Somali national policies, legal, regulatory, and institutional frameworks governing environmental and social management in relation to the rehabilitation and construction of the livestock markets in Adado, Galkayo and Guriel districts, with particular reference to applicable constitutional principles on human dignity, labour relations, access to information, and environmental protection. It further highlights the corresponding Galmudug State-level policies, laws, and institutional arrangements that are applicable to the proposed subproject, ensuring alignment with both federal and state requirements for sustainable, inclusive, and environmentally responsible project implementation.

This ESMP will also ensure alignment and full compliance with the World Bank’s Environmental and Social Framework (ESF) and its Environmental and Social Standards (ESS), as well as the

associated Environmental, Health, and Safety Guidelines (EHSGs) and Good International Industry Practice (GIIP), to which the borrower is obliged, thereby promoting sustainable, safe, and socially responsible implementation of the rehabilitation and upgrading works.

7.1. National Framework

All activities will comply with the relevant laws and regulations of the Federal Government of Somalia and that of the state/region of Galmudug State of Somalia (GSS), including the constitution and all relevant legislations in place.

The provisional Constitution of Somalia

According to the Constitution of the Federal Government of Somalia (FGS), several constitutional provisions are directly relevant to the construction and rehabilitation of livestock markets in the selected three locations.

- ◆ **Article 1** affirms that human dignity is the foundation of all human rights and must be protected at all times; accordingly, the rehabilitation upgrading of the markets will be implemented in a manner that respects and upholds human dignity.
- ◆ **Article 24** guarantees fair labour relations, gender equality, and protection from discrimination and abuse. This will guide the rehabilitation works to ensure equal employment opportunities, gender inclusion, and a safe working environment free from violence and exploitation.
- ◆ **Article 32** establishes the right of access to information. The rehabilitation and upgrading works will regularly engage roadside communities and workers to disclose all relevant subproject information in a timely and transparent manner.
- ◆ **Article 45** underscores the importance of environmental protection and shared responsibility between the government and the public, and in alignment with this provision, the Environmental and Social Management Plan (ESMP) for the rehabilitation of livestock markets incorporates measures to prevent environmental harm and promote conservation throughout the project's implementation.

Somalia Environmental Protection and Management Act (April 2024)

This Act, ratified by the Federal Parliament and signed into law in April 2024, establishes Somalia's core legal framework for environmental protection and sustainable development. It guarantees every person's right to a clean, safe, and healthy environment and embeds principles like precaution, polluter-pays, and sustainability. Risks and impacts for the rehabilitation and upgrading works are temporary, site-specific and manageable as identified in the screening report (already cleared). Therefore, It will be implemented in an environmentally friendly and socially responsible manner. To do so, training and capacity-building session will be provided to both contractors and workers.

Somalia National Climate Change Policy (updated February 2023)

The National Climate Change Policy, updated in February 2023 and led by the Ministry of Environment and Climate Change, provides Somalia's strategic framework to address the challenges of climate change through adaptation and mitigation. According to the finding from the assessment, this activity will not use major engines therefore, no major emission anticipated.

Environmental and Social Impact Assessment and Audit Regulations (ESIA) 2024

These Regulations operationalize the Environmental Protection and Management Act by detailing procedures for Environmental and Social Impact Assessments and audits. They require that all projects likely to have environmental or social impacts conduct an ESIA prior to implementation, including public participation and mitigation planning, and outline standards for ongoing monitoring and compliance. For this subproject risks are temporary, localized and site-specific (being classified as moderate). Therefore, no ESIA is required for this subproject.

In line with the 2024 Environmental and Social Impact Assessment (ESIA) Regulations and the Environmental Protection and Management Act, any project or subproject that is expected to cause significant, long-term, or difficult-to-manage environmental and social impacts is required to undergo a full Environmental Impact Assessment (EIA).

In this case, the planned rehabilitation of the three livestock markets is not expected to result in such impacts. The potential effects are likely to be limited to specific sites, temporary in nature, reversible, and manageable through well-designed mitigation measures. As a result, a full EIA is not considered necessary for this subproject.

The Ministry of Livestock, Forestry and Range (MoLFR), as the government-mandated institution responsible for the sector and Ministry of Environment and Climate Change (MoECC), have been consulted and will play a key role in overseeing the implementation of the project, while safeguard team will monitor the subproject ensuring compliance with applicable environmental and social requirements.

Galmudug Environmental Management Act (Law No. LR 001/2020)

The act provides the legal framework for environmental protection, conservation, and sustainable development within Galmudug State. The Act regulates activities that may have environmental and social impacts and requires the prevention, control, and mitigation of environmental degradation, pollution, and improper waste management. The implementation of the rehabilitation and upgrading works prepares site-specific mitigation measures, train contractors for their implementation and regularly monitor the full compliance.

Somalia Labor Code (Law No 36)

Newly updated Somalia labour code (law No 36) of 2025, has the following key provisions relevant to the subprojects:

- **Employment contracts and conditions:** including duties, duration, remuneration, working hours and termination arrangements.
- **Wages and remuneration:** Workers must receive their agreed remuneration and applicable employment benefits in accordance with the Labour Code.
- **Working hours and rest:** Contractors should comply with statutory working-time requirements, rest periods and applicable overtime arrangements.
- **Occupational health and safety (OHS):** Employers must provide safe and healthy working conditions and take measures to prevent occupational accidents and exposure to workplace hazards. This is directly applicable to excavation, demolition, construction machinery, electrical works, lifting, dust and noise.
- **Workplace hygiene, sanitation and welfare:** Contractors should provide adequate sanitation, washing facilities, safe drinking water and hygienic working conditions.
- **Personal protective equipment and prevention of occupational risks:** Workers exposed to construction hazards should receive appropriate PPE and relevant safety information/training.
- **Protection of young workers/child labour:** Children should not be engaged in hazardous construction activities, particularly work involving machinery, excavation, electricity, heights or other significant risks.
- **Forced labour:** Employment on the project must be voluntary and free from forced or compulsory labour.
- **Non-discrimination and equal treatment:** Recruitment, remuneration and employment conditions should be applied without unlawful discrimination.
- **Freedom of association and collective bargaining:** Workers' lawful rights to organize and collectively represent their interests should be respected.
- **Labour complaints and dispute resolution:** Workers should have access to mechanisms for raising employment-related complaints and resolving labour disputes. This should be integrated with the project's Worker Grievance Mechanism (GM).
- **Labour inspection and enforcement:** Contractors should cooperate with competent labour authorities and comply with applicable labour inspections and enforcement requirements.

This project will be implemented in accordance with the Somalia Labor Code, which establishes the legal framework governing labour relations in rehabilitation and construction activities, including working hours, minimum wages, occupational health and safety, and non-discrimination.

7.2. Institutional frameworks

This section presents all relevant institutions and stakeholders involved in the rehabilitation of livestock markets in Adado, Galkayo and Guriel districts. It defines roles and responsibilities each stakeholder will play to ensuring effective and coordinated implementation of the proposed subproject. It will also facilitate collaboration to avoiding confusion among the stakeholders.

Ministry of Livestock, Forestry and Range (MoLFR):

The ministry of Livestock, Forestry and Range being the lead institution, is responsible for the overall implementation of the rehabilitation activities in the proposed districts.

State Project Coordination Unit (SPCU)

The SPCU safeguarding specialists will take the supervision roles focusing on the Environmental and Social management plans are implemented in compliance with World Bank frameworks and relevant guidelines. SPCU leads the coordination, monitoring and reporting aspects of the proposed subproject.

Contractor

Implements the actual physical rehabilitation and upgrading works in the proposed sites. The constructor is also responsible to implement mitigation measures and strategies set out in the ESMP such as workers safety and occupational health, waste control and management. To ensure this, the contractor will prepare his/her own C-ESMP based on the plans proposed in this ESMP. The contractors will report environmental and social performance to the project team on monthly basis.

District authorities

The districts Municipalities locally supervise the compliance with proper usage of the land, takes community grievances and concerns up to their level and participates coordination and monitoring efforts to ensure effective and smooth implementation of rehabilitation works.

Community Structures/committees

The local community structures participate consultation meetings, mobilization sessions. They also ensure inclusivity, involvements and participations.

7.3. World Bank Environmental and Social Framework (ESF)

The rehabilitation of the livestock markets is guided by several World Bank guidelines and frameworks to ensure environmental sustainability, social inclusion, and safety. These include the World Bank's Environmental, Health and Safety Guidelines (EHS), Environmental and Social Framework (ESF) and Good International Industry Practices (GIIP)

Environmental, Health and Safety Guidelines (EHSs)

the ESMP will provide technical guidance on good construction and rehabilitation practices, including occupational health and safety, waste management, noise control, dust suppression, traffic safety, and emergency preparedness. The general EHSs are particularly applicable, alongside relevant industry-specific good practice for market and infrastructure construction.

Good International Industry Practice (GIIP)

During the rehabilitation activities, GIIP is fully applied to ensure efficient resource use, pollution prevention, workers and environmental protection, and community safety.

Environmental and Social Framework (ESF)

ESF sets out mandatory requirements for managing environmental and social risks through its Environmental and Social Standards (ESS). The table below shows subproject specific Environmental and Social Standards.

Table 2: Environmental and social frameworks

Standards	Description	Project relevance
ESS1	Assessment and Management of Environmental and Social Risks and Impacts	This is a core standard guiding the ESMP. It ensures all potential risks are identified, mitigated, and monitored throughout project implementation.
ESS2	Labor and Working Conditions	Applicable to contractor and labor management; includes OHS, non-discrimination, and prohibition of forced child labor.
ESS3	Resource Efficiency and Pollution Prevention and Management	Relevant to water use, waste management, and energy efficiency.
ESS4	Community Health and Safety	Addresses risks such as traffic safety, works-related risks such as OHS.
ESS5	Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	this addresses economic movement and minor disruption that will likely cause some relocations of livestock business operations within the livestock market boundaries. Measure such as phased rehabilitation/construction and regular community engagement will be prioritized.
ESS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	Relevant; promotes conservation of natural vegetation through landscaping and soil stabilization.
ESS8	Cultural Heritage	Applicable through the inclusion of chance-find procedures during site excavation.
ESS10	Stakeholder Engagement and Information Disclosure	Strongly relevant; ensures ongoing community engagement, transparency, and grievance mechanisms and handling procedures.

7.4. International conventions and treaties ratified by Somalia

Universal Declaration of Human Rights (UDHR– 1948):

Adopted by the United Nations General Assembly in 1948, the UDHR establishes fundamental human rights, including dignity, equality and safe working conditions. These principles will guide the rehabilitation works to ensure humane treatment, non-discrimination, and respect for the rights of workers and affected communities.

International Labour Organization (ILO – 1930-1999):

Address forced labour, child labour, discrimination, freedom of association, and occupational safety. These conventions are directly relevant to rehabilitation activities, supporting fair labour practices, worker safety, and prohibition of child and forced labour.

Convention on the Rights of the Child (CRC - 1989)

Protects children from economic exploitation and hazardous work. The subproject aligns with this convention by ensuring no child labour is used and by minimizing rehabilitation-related risks to children in surrounding communities.

Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW – 1979)

Promotes gender equality and protection of women's rights. The rehabilitation supports these principles through equal employment opportunities, gender inclusion, and prevention of gender-based violence and harassment.

Convention on Biological Diversity (CBD – 1992)

Promotes conservation and sustainable use of biological resources. Although the project is located in an urban area with limited ecological sensitivity, rehabilitation activities will apply precautionary measures to avoid unnecessary environmental degradation and vegetation clearance.

United Nations Framework Convention on Climate Change (UNFCCC – 1992)

Encourages environmentally responsible development. The rehabilitation works supports this objective through efficient resource use, dust control, waste management, and reduction of rehabilitation-related emissions.

Paris Agreement (2015)

The Paris Agreement is relevant to the rehabilitation as it promotes climate-resilient and low-emission development. This convention guides the adoption of climate-smart practices such as efficient use of energy and water, proper waste management, dust and emission control, and design measures that enhance resilience to heat, flooding, and extreme weather conditions, thereby reducing the project's carbon footprint and vulnerability to climate risks.

Basel Convention (1989)

Emphasis on environmentally sound management of hazardous and non-hazardous wastes. It reinforces the need for proper handling, storage, transport, and disposal of the project generated wastes to prevent environmental contamination and risks to human and animal health.

7.5. Compliance summary

Together, these World Bank frameworks, national legislation, and international conventions ensure that the rehabilitation will be implemented in a safe, environmentally sound, socially

inclusive, and responsible manner. Collectively, they provide a strong legal and ethical foundation for effective risk management, stakeholder protection, and full compliance with environmental and social requirements throughout the project lifecycle.

8. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

8.1. Positive impacts

The livestock sector plays a central role in Somalia's economy, food security, and household livelihoods, particularly in Galmudug State. Adado, Galkayo & Guriel District is a strategic livestock trading hub, serving pastoralists, traders, transporters, and consumers across the region. The rehabilitation and upgrading of a modern livestock market under FSRP is expected to generate significant positive environmental, social, and economic impacts

Key positive impacts include:

- **Improved Market Infrastructure:** The livestock markets will provide a safe, organized, and hygienic trading environment, improve efficiency and reduce losses associated with informal trading arrangements.
- **Employment Creation:** the rehabilitation and construction works will create temporary and permanent employment opportunities, including those for youth and women, in line with FSRP inclusion objectives.
- **Enhanced Livelihood Opportunities:** The subproject will support income generation for livestock traders, pastoralists, transporters, service providers, and small businesses, contributing to poverty reduction and economic resilience.
- **Improved Public Health and Safety:** Proper market design has reduced congestion, improved waste management, and enhance animal handling practices, contributing to improved community health outcomes.
- **Strengthened Social Cohesion:** Transparent and inclusive stakeholder engagement processes will enhance trust between communities, local authorities, and the project, supporting social stability.
- **Improved soil health:** Rehabilitation often includes paving, drainage, and designated waste areas, reducing uncontrolled trampling and erosion.
- **Better water management:** Installing proper drainage, wastewater channels, and runoff controls prevents contamination of nearby streams and groundwater. It aligns with regenerative livestock practices that enhance the water cycle.
- **Reduced pollution:** Controlled manure handling and improved sanitation reduce nutrient overload, odors, and pathogen spread.
- **Healthier forage and vegetation:** When markets manage manure properly, composting can support nearby forage production, improving plant diversity and resilience.
- **Reduced disease transmission:** cleaner pens, controlled animal movement, and proper waste disposal reduce pathogens in soil and water, protecting both livestock and wildlife.

8.2. Negative impacts

This section outlines negative social impacts associated with proposed subproject implementation including those related to labor management, GBV/SEAH, occupational safety and health and social inclusion while also referring social standards that relate to any potential negative impact. These risks are short-time, reversible with practical and site-specific mitigation measures.

Table 3: Negative social impacts

Impact nature	Impacts definition	Relevance to ESS
Labor tensions	An influx of jobseekers to worksite may lead to conflict and social tensions and exposures zoonotic diseases.	ESS4
GBV, SEA & SH	Women and girls in the worksite may face potential maltreatments such as verbal or physical harassment or misconduct by workers.	ESS2, ESS4 & ESS10
Community Health and Safety Risks	Safety of structures; and road safety and traffic management; community exposure to health issues such as zoonotic diseases, management and safety of hazardous materials; emergency preparedness; deployment of security personnel to the site.	ESS4
Labor management	- Child or forced labour, unequal opportunity/treatment in the worksites, and inconstant to use of the standard personal protective equipment by the workers in the worksite. - Lack of workers' code of conducts and employment contracts clearly explaining terms of conditions signed from workers. - Not giving enough attention to gender during recruitment, which may result in mostly men being hired and women missing out on employment opportunities, despite the project's target of at least 30% women's participation. - Contractors may fail to clearly display and communicate the project hotline numbers at the site, making it difficult for workers and community members to easily access the grievance mechanism and safely report their concerns or complaints.	ESS2

	- Contractors exceeding allowing 8 working hours on daily bases without workers paid overtime they have worked.	
Water and energy resource and pollution prevention	Improper use of water and energy during the works, air pollution, such as dust affecting workers and the adjacent residents. improper wastewater handling during operation that might lead transmittable diseases. This would affect both humans and the environment. Zoonotic and livestock diseases caused by pests and vectors; measures will include maintaining proper cleanliness of animal holding and trading areas, prompt collection and disposal of animal manure and organic waste, keeping drainage channels clear, eliminating stagnant water and other potential breeding sites, and preventing the accumulation of feed and waste that may attract rodents and flies. Trained vet doctors will be deployed to the sites to inspect livestock at entry gates of the markets. Doctors will also ensure the use right approved quantities of pesticides through best practices and methods to fight against pests and ensure this does not affect other living organisms within the market.	ESS3
Cultural Sensitivities	Construction may expose buried cultural or archaeological materials.	ESS8
Exclusion	Women, youth, and minority groups might be excluded from job or market opportunities.	ESS2

Table 5: Negative Environmental impacts

Impact nature	Impacts definition	Relevance to ESS
Waste generation	Rehabilitation works may generate solid waste. This adds already existing wastes manure, plastics, and construction debris and deteriorate the workers beneficiaries and other surrounding communities as well as the physical outlook of the markets, if not properly managed.	ESS1

Air pollution and dust	Rehabilitation and upgrading activities, movement of vehicles and livestock concentration may increase dust emissions and unpleasant odours to the livestock market's environment.	ESS3
Noise pollution	Concentration of workers, markets traders and livestock populations in the market increases thus affecting nearby resident communities thus, causing socio-economic issues (Guriel)	ESS4
Traffic congestion	Increased vehicular movement and transports to and from the livestock market may contribute to traffic congestion.	ESS4
Soil disturbances	Rehabilitation and upgrading works including increase movement may cause minor soil disturbances/erosions.	ESS3

9. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

This chapter outlines the process for prioritizing the risks identified during the environmental and social screening assessments conducted in the selected livestock markets. It further describes the mitigation measures proposed for each identified risk in line with the World Bank-approved Environmental and Social Management Framework (ESMF), relevant Environmental and Social Standards (ESSs), applicable guidelines, and national regulatory requirements relevant to the subproject.

The table below presents the key environmental and social risks and impacts associated with the rehabilitation and upgrading works of the livestock markets in the selected districts of Adado, Galkayo, and Guriel. The institutional responsibilities, monitoring indicators and timelines are also detailed within the table ensuring completeness.

Objective

Primarily, this plan focuses on the following areas

- Identify relevant environmental and social standards related to the livestock markets construction works and their related potential risks. These risks would be site-specific, reversible, temporary and manageable.
- Under each risk, the plan outlines site-specific mitigation strategies to ensure full compliance with the project approved ESF.

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Table 4: Environmental and Social Management Plan (ESMP)

Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
Pre-rehabs Phase						
ESS 1	Site (E&S screening) – improper site identification leading to land disputes.	Include E&S clauses in bid documents.	MoLFR Engineer, & FSRP PCU	Drawings with E&S provisions; BoQs reviewed and screening report cleared.	Pre-rehabs	500
ESS5	Risks related to Land ownership and site confirmation, physical and economic displacement	Land ownership has already been confirmed during the initial construction. Receive and verify the land ownership letter again from local municipality. Conduct stakeholder meeting including community. Plan rotational/phased rehabilitation and construction availing available spaces within the markets to prevent	PCU safeguards team, MoLFR & LA.	Approved land confirmation letter; site handover signed.	Before mobilization	300

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
		economic displacement.				
ESS10	Stakeholder engagement and GM setup	Conduct consultations and disclose the project information to the public. Establish GM channel and focal person from the community. Be gender sensitive. CoC signed off.	PCU safeguards team, MoLFR & LA.	Consultation minutes; GM contacts posted. CoCs signed off and community trained.	Pre-rehabs	700
Construction/upgrading Phase						
ESS3	Dust and air emissions	Implement dust suppression measures including regular spraying through use of water stockpiles and nearby areas. Limit vehicle speed to ~20km/h.	Contractor / PCU safeguards team	Dust visual check; complaint records.	Daily	Included in the site contractor's BoQs
ESS4	Noise and vibration	Restrict noisy works to daytime. Ensure maintenance of the equipment.	Contractor	Noise < 85 dB; PPE used.	Daily	Included in the site contractor's BoQs

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
ESS3	Soil erosion or disturbances	Plant trees to the already disturbed areas to stabilize slopes. Use proper drainage systems.	Contractor, PCU safeguards team and market management committees	Stable slopes; no visible erosion. Trees planted	Continuous	Included in the BoQs
ESS3	Waste management	Provide adequate waste containers, ensure disposal through the LA designated system, and strictly prohibit open burning. Separate recyclable waste at source.	Contractor, LA & market management	Waste logs; clean site.	Weekly	Included in the site contractor's BoQs
ESS2	Occupational health and safety related risks	Train workers on OHS protocols. Provide and strictly implement the use of PPE; post safety signage, prepositioning of first-	Contractor, MoLFR & SPCU	PPE availability; accident rate = 0.	Daily	Included in the site contractor's BoQs

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
		aid kit and implement heat-stress management strategies such as shade, rest breaks, drinking water.				
ESS4	fire, explosions, leaks or spills, which may occur for a variety of different reasons, including failure to implement operating procedures that are designed to prevent their occurrence, extreme weather or lack of early warning	Engineering controls proportionate to the nature and scale of the hazard; Identification of and secure access to emergency equipment available on-site and nearby; Notification procedures for designated emergency responders; diverse communication channels for notification of the affected community and other stakeholders;	Contractor & PCU safeguards team	Fire-drill reports; inspection forms.	Monthly	Included in the site contractor's BoQs

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
		A training program for emergency responders including Public evacuation procedures;				
ESS2, ESS4	Labor tensions	Prioritize local workers and ensure CoCs signed off. Manage the entrance gate (only works can enter)	Contractor & PCU safeguards team	Signed CoCs; training records.	Quarterly	Included in the site contractor's BoQs
ESS2, ESS4	GBV, SEA & SH risk	Provide GBV sensitization for all workers with particular attention to women. Disclose and post GBV-specific GM ensuring maximum confidentiality.	Contractor, PCU safeguards team	GM channels shared/posted, sensitization sessions conducted & CoC signed off.	Monthly	Included in the site contractor's BoQs
ESS4	Community health and safety	Heighten the fence the site (Guriel) and limit access routes to 1 or 2, posting signages for the locked doors (during construction).	Contractor, FSRP SPCU	Fencing intact; incident register.	Continuous	Included in the BoQ

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
ESS8	Chance-find procedures	Stop work if artifacts found; notify MoLFR; resume after official clearance.	Contractor, MoLFR	Chance-find report and clearance.	As required	Included in the site contractor's BoQ
Operation Phase						
ESS3, ESS4	Solid and liquid waste management	use the dumping pits; routine cleaning; decompose and separate generated waste; into hazardous and non-hazardous, collect in separate designated areas and dispose maintain drainage.	Market Management & LA	Clean market; waste records.	Continuous	market management committees will cover this under their maintenance fee collection fund.
ESS3	Air, Water and soil pollution	Encourage efficient water use, fix leakages and regularly maintain soak pits. Separate clean stormwater from contaminated runoff, use oil-water separators and sediment traps.	MoLFR & LA	Water bills; drainage functional. Separation methods effective. Air, water, and soil quality within permissible limits	Monthly	market management committees will cover this under their maintenance fee collection fund.

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
		Use appropriate covers to loose materials, water to suppress dust and control vehicle movement. Identify possible sources of soil contamination, Segregate, store, and dispose of waste properly, avoid uncontrolled dumping, and Collect and store manure in lined areas to prevent infiltration into soil				
ESS2	improper use of the standard's protective tools and equipment Slips, trips, and falls, Animal handling injuries, Vehicle	Provide appropriate PPE and ensure full use; Provide non-slip flooring, proper drainage, guardrails, adequate lighting	Site Contractor & E&S team	OHS audit records; incident log. Proper PPE provided and used. Incidents reports kept minimal. All materials, equipment, first-aid kits are supplied to the site regularly	Monthly	The ministry of livestock/local authority to cover this cost

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
	and machinery accidents, Heat stress, Manual handling injuries. Exposure to disinfectants, fuel and lubricant, Respiratory irritation, Zoonotic diseases, Exposure to animal waste, Vector-borne risks, and Contaminated surfaces and equipment	Mark pedestrian paths, speed limits, reversing alarms, mirrors Maintain equipment, provide protection equipment Provide shaded areas, ventilation, hydration stations, rest breaks Provide mechanical lifting aids, proper lifting training, job rotation Label containers, secondary containment Provide handwashing stations, disinfectant footbaths, cleaning schedules Ensure frequent removal of manure, lined storage areas, proper disposal				

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
		Provide fly traps, tick control, waste removal, drainage to avoid standing water Report sick animals, isolation pens, veterinary oversight no-smoking zones Clearly mark emergency exits, unobstructed, with evacuation plans posted train on hygiene and emergency response.				
ESS1, ESS10	Gender inclusion	Increase number of female representations in decision-making and market management structures. Allocate stalls for women vendors; include	LA & MoLFR	≥ 30 % female representation.	Quarterly	N/A

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
		women in market committees. Sensitize on GBV, SEA and SH reporting channels.				
ESS2, ESS4, ESS10	GBV, SEA & SH	Maintain GM; conduct GBV awareness for staff and users; confidential reporting mechanism. Women-only meeting	Market Management & MoLFR	GM cases received/resolved; awareness attendance.	Quarterly	300
ESS4	Fire and other emergencies Traffic and road safety hazards Community exposure to biological hazards and zoonotic diseases Pollution impacts (air,	Apply clear traffic signage and designate safe parking lots Ensure disinfection stations at entrances and public areas Restrict public access to animal holding pens Routinely disinfect pens, floors, loading ramps	LA & MoLFR	Fire-safety inspection records. Incident reports are kept minimal. Complaints by site visitors and traders are fully addressed and documented. All required materials and tools are regularly supplied	Annual	350

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
	water, soil, noise, odor) Public safety risks from infrastructure and operations Animal interaction and crowd safety risks Sanitation and waste-related community health impacts	Schedule frequent manure and solid waste collection Apply fly traps, tick control, drainage maintenance Supress dust by water spraying on unpaved areas, and control odor by regular cleaning, and covering waste storage Provide adequate safe walkways and adequate lighting Separate public from animals by fencing, controlled movement lanes Put procedures for escaped or aggressive animals				

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Relevant ESS	Risks & Impacts	Mitigation & Enhancement Measures	Responsible Institutions	Monitoring Indicators	Timeframe	Estimated Cost (USD)
		Keep extinguishers maintenance and functional. Train staff on fire safety protocols including to use the extinguishers.				
ESS10	Community relations and GM	Quarterly meetings with traders and elders; active GM records; transparency posters.	MolFR & LA	Meeting minutes; resolved grievances.	Quarterly	250

10. CAPACITY-BUILDING PLANS

To ensure effective implementation of this Environmental and Social Management Plan, it's very important to enhance the capacity of those directly or indirectly involved in the technical work. Strengthening the technical, operational and ethical capacities of the project stakeholders and institutions will improve the effectiveness of the implementation performances during the construction of the livestock markets.

The following objectives should be focused on capacitating these stakeholders:

1. Introduce project objectives, nature, scope and timeframe.
2. Sensitize environmental and social requirements to comply with throughout the project lifecycle.
3. Improve occupational health and safety of the workers and staff in all phases of the project.
4. Establish and promote coordination mechanism to ensure each stakeholder is involved, informed and participated.

Table 5: Capacity Building Plans

Topics	Target institutions& staff	Contents to be covered	Responsible Institutions	Frequency / Timing	Estimated Cost (USD)
ESMP compliance during Implementation	MoLFR staff, community committees Contractor Environmental and Social Focal officer.	Understanding ESMP components, ESS requirements, roles and responsibilities, reporting procedures and timings.	PCU safeguards team & MoLFR	Pre-construction and annually	\$1,200
Training on Contractor ESMP (C-ESMP) preparation and implementation	The construction manager, Engineer, E&S focal persons	A snapshot of how to prepare C-ESMP.	SPCU team	Preconstruction	\$1,200
Occupational Health and Safety (OHS) and Emergency Preparedness & Response (beyond OHS)	The construction manager, Engineer, E&S focal persons and DVOs.	Health and safety protocols, use of PPE, emergency preparedness and response, and hazard reporting.	PCU safeguards team, Contractor & MoLFR	Quarterly during construction	\$1,500
Capacity building for livestock Market Committees	Community committees	GM reporting channels, E&S monitoring, and facility management	SPCU and DVOs	Quarterly during the construction phase	\$500

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Topics	Target institutions& staff	Contents to be covered	Responsible Institutions	Frequency / Timing	Estimated Cost (USD)
Community Health, Safety, and Waste Management	Market committees, CAHWs, guards & cleaners.	Hygiene, waste segregation, sanitation practices, water use efficiency, and animal and medicinal waste handling and safe access.	MoLFR & Contractors.	During early operation and annually as a refresher	Included in the BoQ budget
GBV, SEA & SH Prevention and reporting mechanisms	Project contractors, community reps, women, youth leaders and site workers	Code of Conduct, GBV, SEA SH sensitization sessions survivor-centered referral pathways, and GM operationalization.	PCU safeguards team, MoLFR	Pre-construction and semi-annually	\$600
Training on Stakeholder Engagement specific to the three communities	Community committees, LA reps and DVOs and traders	Project objectives scope and duration. E&S risks and their mitigation strategies.	E&S team & MoLFR	Preconstruction	\$1,000
Training on Grievance Mechanism operations (ESS10), including GBV pathways	Contractors E&S officer, LA, vet community committees.	GM reporting channels and confidentiality and autonomic aspect.	MoLFR, PCU safeguards team	Pre-construction and Annual refresher	\$1,500

11. IMPLEMENTATION ARRANGEMENTS

11.1. Government responsibilities

The overall responsibility for the works sits with the Ministry of Livestock Forestry and Range as the recipient and implementer of the project. The work is overseen by the State Project Coordination Unit (SPCU) embedded within the Project's institutional structures. The SPCU will contract contractors to undertake the rehabilitation and upgrading of the livestock markets in Adado, Galkayo and Guriel districts. The contractors will implement the project including all Environmental and Social (E&S) mitigation measures defined in this ESMP for the market construction.

11.2. Institutional Roles and responsibilities

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

Table 6: Institutional Roles and Responsibilities

MoLFR	• The MoLFR is responsible for the overall implementation of the Project including monitoring of implementation of this ESMP. • Responsible for the long-run supervision and management to ensure operationalization of the rehabilitated livestock markets. • Establish and manage (in collaboration with Local Authorities) the market management committees (inclusive in representation) that will run daily activities including maintenance.
MoECC	• The ministry plays a regulatory oversight, and advisory role in the rehabilitation of the livestock market particularly, ensures that E&S safeguards are properly integrated through the subproject lifecycle. • At the planning stage, it reviews the screening reports and determine whether the rehabs activities are environmentally suitable and sound to the proposed sites.
SPCU	• SPCU E&S safeguard team will prepare the site-specific ESMP for the subproject. • Oversee the implementation of the site-specific mitigation measures for already identified environmental and social impacts. • Conduct all capacity-building training to ensure smooth implementation. • Prepare and submit quarterly reports outlining E&S performances • Co-manage subproject implementation budget.

Contractor	• The contractor will implement the works based on the agreed design by adopting best construction codes and most environmentally-sound design measures. • The Contractor will prepare a Contractor's ESMP (C-ESMP) before commencing work, by adopting all pertinent E&S mitigation measures in this site-specific ESMP, and customizing them according to the site and work specifics • The Contractor will be responsible for implementing their C-ESMP throughout the contract lifetime. • Implement site-specific mitigation measures and report any unforeseen challenges to the MoLFR and SPCU. • Prepares monthly contractors report and submits to the SPCU E&S team.
Market Committees	• Ensures ongoing waste management, sanitation, and occupational safety within the vet clinics. • Manages community relations, GM records, and coordination with MoLFR and the local authorities. • Conducts routine inspections and reports environmental or social concerns for follow-up.
Local Authorities	• The district authorities locally supervise the compliance with proper usage of the established vet clinics, • Takes community grievances and concerns up to their level and • Participates in coordination meetings and monitoring exercises.

11.3. Contractors and Sub-contractor

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

- Ensure that all operations comply with the mitigation measures laid out in this ESMP, for which the contractor is responsible.
- Ensure that the control measures provided for in the ESMP are both understood and implemented by site personnel.

- Comply with accident and incident reporting as laid out in the ESMF. All severe incidents must be reported through SPCU to the Bank within 48 hours of occurrence.
- Set up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies.
- Monitor the ESMP implementation, against the monitoring indicators laid out in this ESMP and the C-ESMP.
- Participate in community consultative meetings.
- Identify additional significant matters pertaining to environmental and social compliance.
- Liaise with SPCU on the need for corrective action in the event of unexpected environmental or social problems emerging during operations.
- Communicate with all staff regarding E&S compliance requirements and other matters of importance.
- Identify additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Prepare and share periodic reports on all aspects of E&S compliance.
- Maintain lists of all workers, including their age and gender including attrition levels.
- Develop and maintain a workers' grievance mechanism.
- Prepare and maintain an OHS Plan and provide training to all workers on OHS Plan.
- Ensure signing of code of conduct by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.
- Implement the Security Management Plan.
- Undertake workers training on OHS, GM and SEAH
- Undertake periodic stakeholders' engagements with the local communities.

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

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

- Ensure PPE for workers is available and workers are trained in its use
- Provide OHS training to all workers, based on the OHS Plan
- Ensure health and safety of all workers at the construction site
- If necessary, stop the works to ensure safety
- Maintain records of accidents and incidents and ensure appropriate reporting of incidents to SPCU
- Ensure waste management procedures are followed closely

- Ensure availability of water and sanitation facilities for all workers at site and at the campsite
- Conduct toolbox talks for workers
- Train all workers in the CoC and ensure that CoC is signed by every worker
- Liaise closely with the SPCU on training workers on GBV issues, as well as community awareness on GBV
- Maintain workers' lists indicating age and gender
- Maintain records of Workers' GM

Table 7: Reporting plan

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

12. PUBLIC CONSULTATION AND FEEDBACK

A stakeholder consultation meetings and sessions were conducted between April 30, to May 3, 2026. The meetings were held in the livestock marketplaces of each district. The sessions brought together 20 participants each district, with 30% quota for women. The participants represented different livestock groups (cooperatives, traders, butchers, meat traders and rural pastoralist) government presentative (local authority members and state ministry of livestock)

A stakeholder mapping exercise was conducted to identify key actors involved in the rehabilitation and operation of the livestock markets. Primary stakeholders included livestock communities such as women, youth, elders, livestock traders, herders, cooperatives, and district ministry representatives, as they are directly affected by and engaged in the subproject. Secondary stakeholders included relevant line ministries and local authorities responsible for coordination, oversight, and regulatory compliance. The mapping exercise was based on stakeholders' influence, interest, relevance and impact to the proposed subproject

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

In the meeting, the stakeholders discussed the following elements

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

Actions agreed

- ◆ The consultation aimed to review project progress, validate safeguard implementation measures, and ensure inclusive participation in decision-making.

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

As part of the wider engagement, the project team also conducted stakeholder management and outreach with nearby neighbours, to ensure they are informed of rehabilitation activities, expected impacts, and mitigation measures.

Outcome of the consultations

- 1) All stakeholders clearly understood, accepted, and agreed to comply with the subproject requirements and guidelines, including the Environmental and Social Standards in line with the World Bank framework.
- 2) The ownership and management of the proposed land were jointly discussed and confirmed to be under the authority of the government (Local Administration) in the respective villages, with no disputes reported.
- 3) Community concerns and suggestions were recorded and will be addressed through the Environmental and Social Management Plan (ESMP) to ensure the project meets local needs.
- 4) Participants emphasized the importance of strong collaboration and coordination among stakeholders to ensure effective and high-quality implementation of the rehabilitation and construction activities.
- 5) During the meeting, participants and the Environmental and Social (E&S) specialist discussed possible risks and impacts during construction and operation, including noise, vibration, soil disturbance, and risks related to Gender-Based Violence (GBV), among others. It was agreed that the expected risks are minor, short-term, and reversible, and can be managed using standard mitigation measures in line with the project's Environmental and Social Framework (ESF/ESMF).

13. GRIEVANCE MECHANISM (GM)

The Grievance Redress Mechanism (GM) is established to provide an accessible, inclusive, transparent, and timely platform for project-affected parties to raise concerns related to environmental and social performance during the rehabilitation of livestock markets. In line with the World Bank Environmental and Social Framework, particularly ESS 10 on Stakeholder Engagement and Information Disclosure, the GM aims to facilitate early identification, assessment, and resolution of grievances to prevent escalation, strengthen accountability, and minimize project delays.

This mechanism applies to a wide range of rehabilitation-related issues and is implemented in accordance with national laws of the Federal Government of Somalia and applicable World Bank Environmental and Social Standards, ensuring that all stakeholders can safely and confidently voice concerns without fear of retaliation.

13.1. Objective

- Establish an accessible, inclusive, transparent, and timely mechanism for project-affected parties to raise concerns related to environmental and social (E&S) performance during livestock markets rehabilitation.
- Ensure compliance with World Bank Environmental and Social Framework (ESF), particularly ESS 10, Stakeholder Engagement and Information Disclosure.
- Enable early identification, response, and resolution of grievances to prevent escalation and project delays.

13.2. Scope of Grievances

This Grievance Redress Mechanism (GM) covers grievances arising from rehabilitation-related activities, including occupational health and safety risks at livestock markets rehabilitation sites; land access and movement restrictions; and impacts on pastoralists, markets committees, and surrounding communities. It also addresses labour and working conditions issues (aligned with ESS 2), environmental impacts (aligned with ESS 1 and ESS 3), and community health and safety concerns (aligned with ESS 4).

13.3. Institutional Responsibility

The State Project Coordination Unit (SPCU) Environmental and Social (E&S) Team holds overall responsibility for GM implementation. All grievance handling will comply with national laws of the Federal Government of Somalia (FGS) and Applicable World Bank Environmental and Social Standards (ESSs). A clearly defined, documented, and publicly disclosed GM will be available to all stakeholders.

13.4. GM Escalation levels

Contractor:

Contractors will establish site-specific Grievance Mechanisms (GM) as part of their compliance requirements. Through these mechanisms, they will receive and manage grievance cases at the site level. These cases will generally involve minor complaints related to construction activities. In line with project guidelines, contractors are responsible for addressing and resolving such grievances in a timely manner. However, sensitive cases or complaints beyond their capacity should be promptly escalated to the SPCU Safeguarding Team for further action.

SPCU Staff:

At the state level, the Safeguarding Team, particularly the Social Safeguards Specialist, will be responsible for receiving grievances through established channels such as hotlines, phone calls, or email. In accordance with the grievance resolution protocols, the Social Safeguards Specialist will manage cases confidentially and within the specified timelines. Feedback will be provided to complainants within the defined timeframe, clearly indicating the response and actions taken to address the concern.

NPCU:

Sensitive or major cases that cannot be resolved at the SPCU level will be escalated to the National Project Coordination Unit (NPCU) Environmental and Social (E&S) Team. Based on the nature and sensitivity of the grievance, the NPCU team will review the case and provide appropriate guidance and resolution. The directives and decisions will then be communicated back to the SPCU E&S Team for implementation of the agreed resolution.

13.5. GM accessibility

Multiple channels to accommodate literacy levels, mobility constraints, and technology access. Right to submit grievances anonymously, with no identifying details logged if anonymity is requested. All project-affected populations should have full access to the project GM regardless of their gender and social status ensuring inclusivity, confidentiality and transparency. When submitting a grievance, primary entry point will be the state-level Social Safeguards Specialist. The grievances can be submitted via:

- Phone calls or text messages to publicized mobile numbers.
- Email to dedicated project email addresses.
- In-person communication.

13.6. Contractor-Level Grievance Intake

Contractors will be responsible to maintain a site-level grievance and ensuring gender responsive implementation of the modern rehabilitation of livestock markets in Adado, Galkayo and Guriel district. The constructor should be;

- Trained in grievance handling and ESF requirements.

- Authorized to receive and address immediate site-level complaints.
- If grievances cannot be resolved at contractor level, they will be escalated and formally logged into the Project GM.

13.7. GM Structure and Coordination

A designated GM focal point will be appointed within the SPCU at state level. This is usually the social safeguard specialist. All project team will work with the focal person in terms of reporting identified cases. Upon receipt of a grievance:

- The SPCU GM Focal Point shares the case with the relevant NPCU GM focal person.
- Coordination ensures consistency across state and national levels. Subproject actors (SPCU staff, contractors, supervisors) will receive pre-construction training on the GM (per the S-FSRP GM Manual).

13.8. Grievance Submission Channels

- Direct communication: In person or by phone with SPCU GM Focal Point or contractor representative.
- Physical submission: Suggestion or complaint box installed at a visible, safe, and accessible location at the livestock markets rehabilitation and upgrading site entrance.
- Electronic submission: Email to a dedicated project grievance email address.

13.9. Grievance Handling Process

The process should follow a structured, clear and detailed way where each can be tracked. The following are summary of the steps;

1. Receipt and Registration - All grievances are formally logged into the GM database.
2. Acknowledgement - Complainant receives acknowledgment within three (3) working days informing the client.
3. Assessment and Investigation - E&S specialists review the grievance, consult relevant parties, and assess compliance with ESSs.
4. Proposed Resolution - A resolution is proposed within fifteen (15) working days of acknowledgment.
5. Communication of Outcome - Complainant is informed of actions taken and final resolution made.
6. Follow-up and Closure - SPCU confirms satisfaction or documents unresolved cases for escalation.

13.10. GBV, SEA, and SH-Specific Grievance Mechanism

Separate, confidential reporting channel established for Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). These should be handled in survivor-

centred approach while confidentiality and non-retaliation actions strictly adhered throughout. No requirement to use the standard GM. Referral to appropriate support services will be immediately encouraged and enhanced.

13.11. Confidentiality

All grievances are handled confidentially with anonymous complaints accepted and processed equally. Access to grievance records is restricted to authorized personnel.

13.12. World Bank GM

Stakeholders will be informed that if they are not satisfied with the resolution provided by the project-level GM, they have the right to escalate their concerns to the World Bank's Grievance Redress Service (GRS).

13.13. Monitoring, Reporting, and Continuous Improvement

Regular monitoring of grievance trends related to livestock markets rehabilitation will be conducted through site visits. Monthly contractor reports will be shared with NPCU and World Bank as part of ESF compliance and lessons learned incorporated into contractor management and stakeholder engagement activities.

14. ESMP IMPLEMENTATION AND CAPACITY-BUILDING BUDGET

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

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

Table 8: ESMP Implementation and Capacity Building Budget

Topics	Target institutions/groups	Responsible entity	Budget
EHS induction training and safety toolbox talks,	Subproject managers, E&S focal persons	SPCU & MoLFR	\$1, 200
Emergency Preparedness and Response Plan (EPRP)	the EPRP will be prepared in line with project guidelines	SPCU	\$2,500
Stakeholder and public consultations meetings	Resident community, MoLFR staff and contractor	SPCU	\$6,000

CLUSTERED ESMP – REHABILITATION AND UPGRADING OF LIVESTOCK MARKETS

Topics	Target institutions/groups	Responsible entity	Budget
Environmental and Social Grievance Mechanism (E&S GM),	Site-specific GM will be established and GM sensitization sessions will be conducted	Contractor & SPCU	\$3,000
GBV/SEA/SH prevention and response services;	All workers	SPCU E&S team	\$2,500

15. ANNEXES

15.1. Annex 1: Lands ownership confirmations

Adado: Land ownership certificate

Jamhuuriyadda Federaalka Soomaaliya
Dowlad Goboleedka Galmudug
Dowladda Hoose Degmada Cadaado



جمهورية الصومال الفيدرالية
حكومة إقليم جلمدغ
بلدية مدينة عدادو

Galmudug State
Local Government of Adado District
Mayor of Adado

REF: XGDC/029/ 2023 Tr: 15/07/2023

KU: Wasaaradda Xanaanada Xoolaha Dhirta & Dhaaqa Galmudug =Dhuusamareeb=
Og: Taliyaha Booliska Degmada =Cadaado=
Og: Agaasimaha Howlaha Guud iyo Dhulka Degmada =Cadaado=
Og: Xoghayaha Degmada =Cadaado=
Og: Gudoomiye kuxigeenka Degmada =Cadaado=

UJEEDDO: DAYACTIRKA SUUQA XOOLAHA

Gudoomiyaha Degmada Cadaado

Markuu arkay: Baahida loo qabo in yactiro loo helo suuqa xoolaha

Markuu arkay: Muhiimadda ay u leedahay adeegga bulshada.

Hadaba, Gudoomiyaha Degmada Cadaado ahna duqa magaalada wuxuu Wasaaradda Xanaanada Xoolaha Dhirta & Dhaaqa Galmudug ka codsanaa in ay dayactir ku sameeyaan suuqa xoolaha Degmada Cadaado, waaxda Karaama.

Gudoomiyuhu wuxuu Wasaaradda Xanaanada Xoolaha Dhirta & Dhaaqa Galmudug ka rajeynaa inay aqbalaan codsigeena, sida ugu dhaqsiiyaha badan inuugu dayactiri doonaan suuqa xoolaha.

Mahadsanidiin

Faarax Diiriye Warsame
Gudoomiyaha Degmada Cadaado

Saxiix: 



Galkayo: Land ownership certificate

Jamhuuriyadda Federaalka Soomaaliya
Dowlad Gobolleedka Galmudug
Dowladda Hoose Degmada Galkacyo



Galmudug State
Local Municipality of Galkaio District
Office of Mayor

جمهورية الصومال الفيدرالية
حكومة إقليم جلمدج
بلدية مدينة جالكعيو

TIX: WH/DDG:274/23

Tr: 23/11/2023

Ujeedo: Cadeyn Bixin dhul

Anagoo 'ah Dowladda Hoose Degmada Galkacyo Galmudug waxaan halkaan ku Cadeenayaa dhul ay leedahay Dowladda Hoose oo ku yaal Degmada Galkacyo Xaafada **Garsoor** agagaarka Saldhiga Cusub ee dooxada oo Ay Leedahay **Dowladda Hoose Ee Degmada Galkacyo Galmudug** Dhulkaas oo cabirkiisu yahay 100×100 oo ah dhul **Banaan**

Waxay Dowladda Hoose u Bixisay suuqa xoolaha lagu ganasado in laga dhiso Bulshada Degmada Galkacyo Galmudug.

Dhulkaan loogu talagalay Suuqa waxay Dowladda Hoose waxay cadaynaysaa in ay Bixisay una bixisay suuqa xoolaha.

Dhulkaas waa mid Sharcigiisa iyo sugnaatiisa Ay Dowladda Hoose Leedahay Madax Banaan Cidkasta oo wax uqabanaysa Dhismaha Suuqa Xoolaha.

Mahadasanidiin

Jihooyinka Dhulka suuqa

Bari = Waddo
Galbeed = Waddo
Koonfur = Waddo
Waqooyi = Dhul Dad

Mahadsanadin
Md. Cabdiraxmaan Sheekh Xasan Jimcaale
Gudoomiyaha Degmada Gaalkacyo



Dowladda Hoose ee Degmada Galkacyo
Email: mayor@galkacyo.gm.so / info@galkacyo.gm.so
Tell: +252-61-5888981/+252-90-7795669

Guriel: Land ownership certificate

JAMHUURIYADDA FEDERAALKA SOOMAALIYA Dowlad Goboleedka Galmudug Muamulka Degmada Guriceel Xafiiska Gudomiyaha		FEDERAL REPUBLIC OF SOMALIA Galmudug State of Somalia Administration of Guri'el District Commissioner Office
Ref no: MDG/0073/2019 Ka: mamulka dagnada Guriceel Ku: Hay'ada NRC Ujeedo: ogolansho dhul dhisme suuqa xoolaha dagnada Guriceel. Hay'ada NRC waxaan oga mahadnaqeynaa howlaha ay ka fulisay iyo kuwa hada ay ka wado dagnada Guriceel iyo deganada hoosyimaada. Madaama bulshadu ay codsatay suuq xolad in loo dhiso ayna ka aqbashay hay'adu, hay'aduna ay bulshada u dirtay in ay la yimadaan dhulkii looga dhisi lahaa suuqa, sidaa darteed waxaan halkan ku cadeynaynaa in bulshadu dhulkii uu diyaar u yahay ayna kala bexeen lacagtooda una bahan yihiin in looga dhiso suuqa sidaasna ay ugu warejiyeen maamulka. Intaas ka dib mamulka dagnada Guriceel waxey halkaan ku cadeynayaan in hay'ada NRC ay nooga dhisaan suuqii dhul cabir kiisu yahay 20*20 boos (labatan lagu dhufay labatan boos) oo ku yaalo kofur bari Dagnada Guriceel. Waxaan cadeynaynaa mar labaad in dhulkas cabirkiisa aan kor ku xusnay ay bulshada uso diyarsadeen in looga dhiso suuqii xolaha dagnada noogana dhisto hay'adu NRC suuqi xolaha. Naga gudoma salan sare Wabilaahi towfiiq		Date: 19/04/2019
		Mahadsanidin Cabdulaahi Maxamad Barre Gudomiyaha dagnada Guriceel 
Email: d.guriceel114@gmail.com Tell: +252615849991/+252615933170/+252625849991		

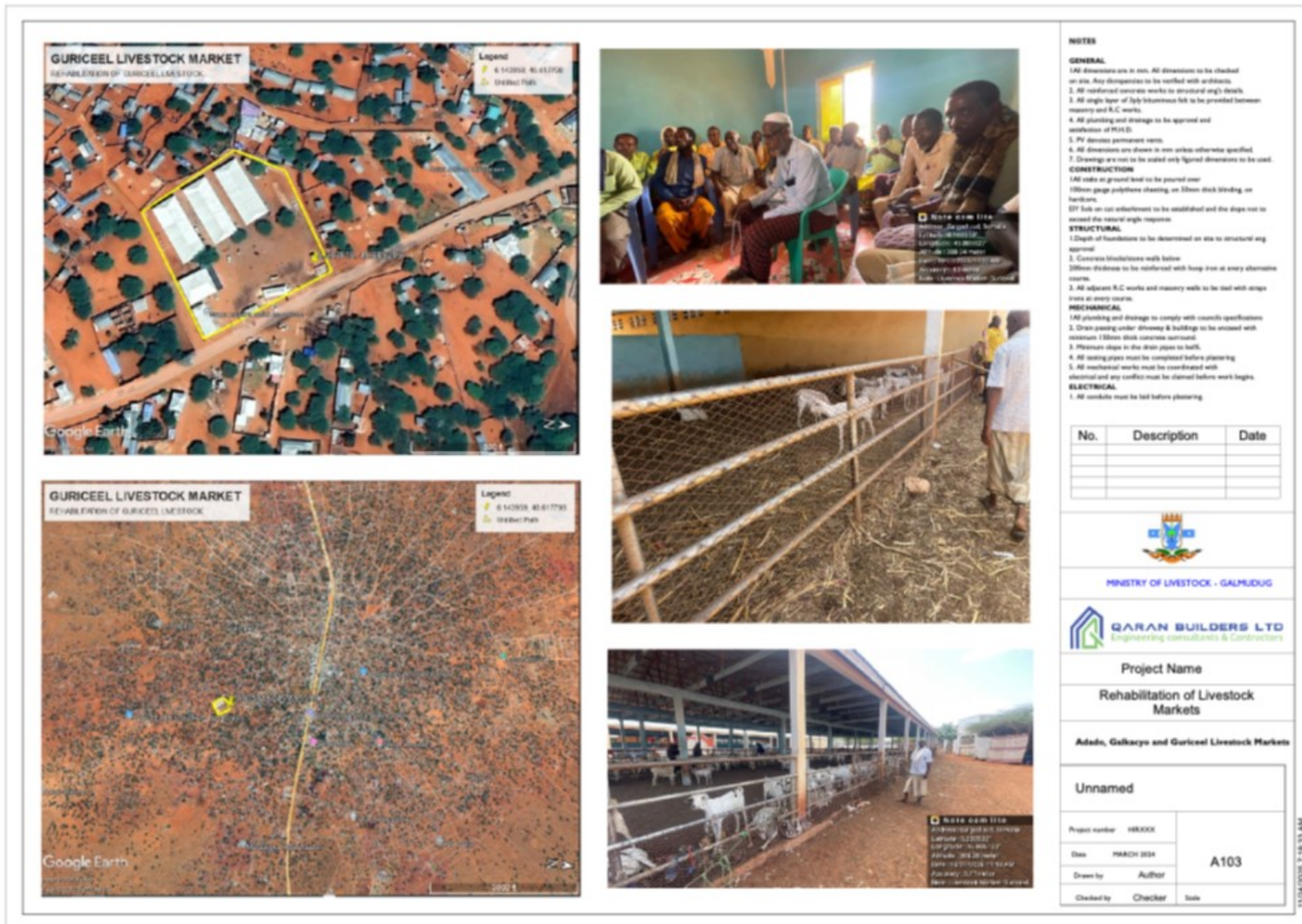
15.2. Annex 2: Markets drawings – the technical design



ESMP – REHABILITATION AND UPGRADING OF LIVESTOCK MARKETS



ESMP – REHABILITATION AND UPGRADING OF LIVESTOCK MARKETS



15.3. Annex 3: Photos of the participants during public consultation meeting



15.4. Photos for Critical rehabilitation sites



15.5. *Annex 4: Attendance sheets for the people consulted*



Activity: Stakeholders Consultation meeting on the rehabilitation livestock market

Adado District

ATTENDANCE SHEET

SN	Name	Gender	Location	Institution	Signature
1.	Hafso Ali Yusuf	F	Adado	Isfelo	hafso
2.	Deefa Aden Ibrahim	F	Adado	deefa	deefa
3.	Nimco Abraham Warsame	F	Adado	Nimco	Nimco
4.	Adling Ali Dahir	F	Adado	L-Trade	adling
5.	Najma Wadi Aden	F	Adado	West Trade	Najma

ESMP – REHABILITATION AND UPGRADING OF LIVESTOCK MARKETS

6.	Mustafin Barkir Noor	F	Adado	Gmc member	Barkir
7.	Muntaz Noor Gohar	F	Adado	Gmc member	Taz
8.	Alsha Yusuf Hussein	F	Adado	Vice-chair person	Alsham
9.	Hussein Barre Noor	M	Adado	Chair person	HS
10.	Noor Mire Yusuf	M	Adado	pastorist	Mige
11.	Ahmed Ahmed Geed	M	Adado	Cooperative Member	Geeto
12.	Abdullah Yusuf Aden	M	Adado	Meat trader	Atgati
13.	Mosab Yusuf Noor	M	Adado	Butcher	Laal
14.	Abdulkadi Mohamed Ali	M	Adado	Trader	Fansay
15.	Mohamed Ibrahim Noor	M	Adado	h. Trader	Am
16.	Morkaf Ahmed Shine	M	Adado	Trader	Shimmo

ESMP – REHABILITATION AND UPGRADING OF LIVESTOCK MARKETS

17.	Fareh Adeu Noorle	M	Adabo	Conc member	BSSSP
18.	Mohamed Jimale Jarow	M	Adabo	Conc member	Musfau
19.	Khalif Omar Gope	M	Adad	L. Trade	Luulhuu
20.	Abdullah Hagi	M	Adabo	NGO Rep	Luulhuu

Prepared by:

Name: Abdulkadi Abdulkadi Abd.

Title: ENV. Specialist

Signature: [Signature]

Date: 20, 3, 20

Approved by:

Name: Abdulkarim Mohamed

Title: Project Coordinator

Signature & Stamp:

Date: 6, 5, 20



Activity: Stakeholders Consultation meeting on the rehabilitation livestock market

Guriel District

ATTENDANCE SHEET

SN	Name	Gender	Location	Institution	Signature
1.	ISSE YUSUF ALI	M	GURIEL	CML member	
2.	YAHYE MOHAMED	M	GURIEL	Livestock Trader	Jaxye
3.	ABDI JASIN MOHAMED	M	Market GURIEL	CHAIR PERSON	
4.	ABDI MUHAMMAD	M	GURIEL	Market CML	
5.	SAADIQ FARAH DI	M	GURIEL	Co-chair PERSON	

6.	MOHAMED ISSE	M	GURIEL	L-Trader	
7.	NOOR JAMA DHORE	M	GURIEL	L-Trade	
8.	ABDIKARIM ADEN HASHI	M	GURIEL	CML member	
9.	FARHAN YUSUF ALI	M	GURIEL	Trader	
10.	OMAR MOHAMED	M	GURIEL	Pastorist	✓
11.	ABDI MOHAMED	M	GURIEL	TEB Trade	
12.	ZAHRA KETNAN ADEN	F	GURIEL	VICE CHAIR	
13.	HANA MOHAMED ADEN	F	GURIEL	CML member	
14.	DEQA MOHAMED GADI	F	GURIEL	CML member	
15.	SHUKRI ADEN HASHI	F	GURIEL	CML member	
16.	HAWEYO MOHAMED	F	GURIEL	L-Trade	



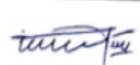
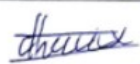
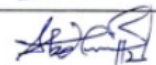
Activity: Stakeholders Consultation meeting on the rehabilitation livestock market

Galkayo District

ATTENDANCE SHEET

SN	Name	Gender	Location	Institution	Signature
1.	GAYR ALI HESRI	M	Galkayo	Market chair person	<i>[Signature]</i>
2.	ABDULLAH, Mohamed Gedi	M	Galkayo	Livestock Trader	<i>[Signature]</i>
3.	Mohamed SH ABDI	M	Galkayo	Agropastoral person	Maxmed
4.	ABDI SATAD AHMED	M	Galkayo	L. Trader	abdi
5.	Omar Mohamed Raage	M	Galkayo	Butcher	Raage

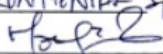
6.	Mohamed DAHIR ALI	M	Galkayo	Meat Trader	<i>[Signature]</i>
7.	HASAN MIRE SHIQOW	M	Galkayo	Livestock Trader	Mire
8.	Mohamed KALIF AHMED	M	Galkayo	Committee Member	Anshax
9.	ABDIFATAH HASAN DIRIE	M	Galkayo	Committee Member	dirie
10.	ABDI SHEKEYE	M	Galkayo	CML member	<i>[Signature]</i>
11.	DURAN ALI DINI	M	Galkayo	CML Member	<i>[Signature]</i>
12.	Oman YUSUF HARARE	M	Galkayo	CML member	<i>[Signature]</i>
13.	Mohamed GAYRE	M	Galkayo	Livestock Trader	gayr axmad
14.	Hafina Mohamed BIRIR	F	Galkayo	VICE-CHAIR PERSON	<i>[Signature]</i>
15.	HANA ABDI WARIAME	F	Galkayo	Livestock Trader	<i>[Signature]</i>
16.	WARHAN AHMED ALI	F	Meat Trader	Meat Trader	<i>[Signature]</i>

17.	JAWAHIR Kulme	F	Galkayo	Trader	
18.	FARHA Mohamed	F	Galkayo	Meat Trader	FARxiyo
19.	DHUH ABDI Mohamed	F	Galkayo	Meat Trader	
20.	ABSHIR	M	Galkayo	MOLFR Rep	

Prepared by:

Name: ABDULKADIR ABDULWADI ABDI

Title: ENVIRONMENTAL SPECIALIST

Signature: 

Date: 1 / 5 / 26

Approved by:

Name: Abdulkadir Mohamed Hasi

Title: Project Coordinator

Signature & Stamp:

Date: 6 / 5 / 26

15.6. *Annex 5: Code of Conduct (CoC)*

WORKER CODE OF CONDUCT - SUMMARY

Subproject Name: _____

Contractor company Name: _____

Key Terms and Conditions

1. Perform duties honestly and responsibly, and respect Somali laws and project Environmental, Social and SEAH requirements.
2. Wear Personal Protective Equipment (PPE) at all times on site.
3. No drugs, alcohol, weapons, theft, bribery or fraud.
4. Report unsafe conditions, accidents, or near-misses immediately.
5. No harassment, bullying, discrimination, or violence.
6. Strict prohibition of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and sexual harassment (SH).
7. No child labor (under 18) or forced labor.
8. Respect local communities, their safety, property and environment.
9. Violations will lead to disciplinary action, dismissal, or legal consequences.

Acknowledgment

I, the undersigned, have read, understood, and agree to comply with this Code of Conduct. I understand that failure to follow these rules will result in disciplinary action.

Worker's Name: _____

Signature: _____

Date: _____

Contractor's Representative (Witness):

Name: _____

Position: _____

Signature: _____

official stamp: _____

Date: _____

15.7. *Annex 6: Chance Finds Procedure (CFP)*

Rehabilitation and Upgrading of Livestock Markets under the Somalia Food Systems Resilience Project (FSRP)

Project: Somalia Food Systems Resilience Project (FSRP)

Financing: World Bank

Employer: Galmudug State Ministry of Livestock, Forestry and Range (MoLFR)

Activity: Rehabilitation and upgrading of livestock markets (Adado, Galkayo & Guriel)

Application: All project sites, work areas, access routes, borrow areas, material storage areas, and other areas disturbed by project activities

1. Purpose

This Chance Find Procedure (CFP) establishes the actions to be followed if previously unknown or suspected cultural heritage, archaeological materials, structures, graves, human remains, or other objects of potential cultural or historical significance are encountered during the rehabilitation and upgrading of livestock markets.

The purpose of this procedure is to ensure that any chance find is appropriately protected, documented, reported, assessed, and managed in accordance with applicable national requirements and the World Bank Environmental and Social Framework (ESF), particularly ESS8: Cultural Heritage, while avoiding unnecessary damage, disturbance, or loss.

The procedure applies to all contractors, subcontractors, workers, supervisors, consultants, and project personnel undertaking activities that may disturb the ground or existing structures.

2. Activities Where Chance Finds May Occur

Chance finds may occur during, but are not limited to:

- Site clearance and preparation;
- Excavation and earthworks;
- Foundation and footing excavation;
- Installation of drainage systems and culverts;
- Construction or rehabilitation of water supply and sanitation facilities;
- Installation of underground utilities;
- Demolition or removal of existing structures;
- Construction of livestock holding pens and market infrastructure;
- Construction of access roads and parking areas;
- Grading and levelling;
- Excavation for waste-management facilities;
- Establishment of temporary facilities, storage areas and camps; and
- Any other activity involving excavation, ground disturbance, or removal of existing structures.

3. Potential Chance Finds

For the purpose of this procedure, a chance find may include, but is not limited to:

- Archaeological artifacts, pottery, ceramics, coins, tools, weapons, beads, ornaments or other objects;
- Stone, mud-brick, masonry or other structures of possible historical or archaeological significance;
- Foundations, walls, graves, burial sites, tombs or other subsurface structures;
- Human or animal skeletal remains where their cultural or archaeological significance is uncertain;
- Objects, inscriptions, carvings, monuments or features of cultural or religious significance;
- Ancient settlement remains or evidence of previous occupation;
- Historic objects, documents or materials; and

- Any other object or feature that appears to have archaeological, historical, cultural, religious or social significance.

Where there is uncertainty regarding whether an object or feature constitutes cultural heritage, it shall be treated as a potential chance find until assessed by a competent authority or qualified specialist.

4. Responsibilities

4.1 Contractor

The Contractor shall:

- Ensure that all workers and subcontractors are informed of this CFP before commencing works;
- Provide appropriate induction and toolbox training on the identification and reporting of chance finds;
- Immediately stop work in the affected area when a potential chance find is encountered;
- Secure and protect the discovery from damage, theft, unauthorized access, or further disturbance;
- Immediately notify the Site Supervisor/Engineer and the Contractor's Environmental and Social Officer;
- Maintain records of any chance find and actions taken; and
- Resume work only after receiving the required clearance or authorization from the responsible authority/project management.

4.2 Contractor's Environmental and Social Officer

The Environmental and Social Officer shall:

- Verify the reported discovery without disturbing it;
- Ensure that the area is adequately protected and access is controlled;
- Document the discovery using photographs, location coordinates, descriptions and other relevant information;
- Immediately inform the Site Engineer/Project Manager and the Employer's E&S representative;
- Facilitate notification of the relevant government authority or competent heritage institution;
- Maintain the Chance Find Register;
- Monitor implementation of any required protection, investigation, excavation, removal or preservation measures; and
- Ensure that workers do not resume activities in the affected area until the required clearance has been obtained.

4.3 Employer – Galmudug State Ministry of Livestock, Forestry and Range

The Employer shall:

- Ensure that the CFP is incorporated into the Contractor's C-ESMP and contractual obligations;
- Ensure adequate resources are available for implementation of the procedure;
- Coordinate with the relevant Galmudug and Federal Government authorities where required;
- Ensure that appropriate technical advice is obtained from qualified cultural heritage/archaeological specialists where necessary; and
- Confirm that the Contractor complies with the procedure before authorizing works to resume.

4.4 SPCU/FSRP Environmental and Social Team

The FSRP/SPCU E&S team shall:

- Provide oversight and technical guidance on the implementation of the CFP;
- Ensure consistency with the FSRP Environmental and Social Management Framework and the World Bank ESF;
- Support coordination with relevant authorities and specialists;
- Review documentation and corrective measures associated with significant chance finds; and
- Report significant cultural heritage incidents to the appropriate project and World Bank channels in accordance with applicable project procedures.

4.5 Workers

All workers shall:

- Attend the required cultural heritage/chance-find induction;
- Remain alert for potential archaeological or cultural heritage materials;
- Immediately report any suspected find to their supervisor;
- Not touch, remove, clean, sell, collect, damage or otherwise interfere with a potential chance find; and
- Follow instructions issued by the Contractor's management and E&S personnel.

5. Chance Find Procedure

Step 1: Stop Work Immediately: If any potential archaeological, cultural heritage material, grave, human remains, structure or other suspected cultural heritage resource is discovered:

All work shall immediately stop in the affected area: The work stoppage shall apply to excavation, earthmoving, vehicle movement, material placement, construction and any other activity that could disturb or damage the discovery.

Work may continue in other areas of the site provided that such activities cannot affect the discovery or its potential surrounding context.

Step 2: Protect and Secure the Discovery: The Contractor shall immediately:

- Establish a temporary exclusion zone around the discovery;
- Install warning tape, barriers, fencing or other suitable markers;
- Prevent workers, equipment and vehicles from entering the protected area;
- Prevent unauthorized persons from accessing the site;
- Protect the discovery from weather, erosion, vandalism, theft and accidental damage; and
- Ensure that no materials are stored or construction activities undertaken within the protected area.

The discovery shall remain **in situ** unless a competent authority or qualified specialist determines that removal is necessary.

Step 3: Do Not Disturb the Find: Workers, supervisors and other project personnel shall **not**:

- Touch or remove the object;
- Dig around the discovery;
- Clean, wash, scrape or modify the object;
- Move bones, artifacts, stones or other materials;
- Attempt to identify or date the object themselves;
- Collect artifacts as souvenirs;
- Sell, retain or transport any discovered item; or
- Resume excavation around the discovery without authorization.

The location and surrounding context of the find shall be preserved as far as reasonably practicable.

Step 4: Record and Document the Discovery: Without disturbing the find, the Contractor's Environmental and Social Officer shall document:

- Date and time of discovery;
- Exact location and GPS coordinates, where practicable;
- Name of the person who discovered it;
- Description of the discovery;
- Approximate depth at which it was found;
- Current condition of the discovery;
- Surrounding land use and site conditions;
- Photographs from a safe distance, including a scale reference where appropriate;
- Activities being undertaken when the discovery occurred; and
- Immediate protective measures implemented.

A **Chance Find Record Form** shall be completed and maintained in the project records.

Step 5: Immediate Notification: The person discovering the find shall immediately notify the Site Supervisor.

The Site Supervisor shall promptly notify:

1. Contractor's Environmental and Social Officer;
2. Contractor's Project Manager/Site Manager;
3. Employer's Site Engineer/Representative;
4. Employer's E&S focal point; and
5. FSRP/SPCU E&S team, where the find is significant or potentially significant.

The relevant government authority responsible for cultural heritage/archaeological matters shall then be notified through the Employer/project management structure.

Step 6: Notification of Relevant Authorities: The Employer and/or FSRP shall coordinate notification with the competent government authority responsible for cultural heritage, archaeology, museums, historical sites or related matters, as applicable.

Where the responsible authority cannot be immediately identified or reached, the discovery shall remain protected and work shall remain suspended in the affected area until appropriate guidance is obtained.

Where necessary, a qualified archaeologist, cultural heritage specialist, or other competent professional shall be engaged to assess the discovery.

Step 7: Assessment of the Discovery: The competent authority and/or qualified specialist shall assess the discovery and determine:

- Whether it constitutes cultural heritage;
- Its potential archaeological, historical, cultural or religious significance;
- Whether additional investigation is required;
- Whether the discovery can remain in situ;
- Whether controlled excavation or removal is necessary;
- Whether consultation with affected communities or relevant traditional/religious authorities is required;
- Whether the project design or construction method needs to be modified; and
- Whether additional mitigation, monitoring or preservation measures are required.

No project personnel shall make a final determination regarding the significance of a suspected cultural heritage resource without appropriate technical advice where specialist assessment is required.

Step 8: Develop and Implement Mitigation Measures: Based on the assessment, the Employer, Contractor, FSRP/SPCU and relevant authority shall agree on appropriate management measures.

These may include:

- Preservation of the find in situ;
- Establishment of a permanent or temporary protected area;
- Controlled archaeological investigation;
- Controlled excavation and recording;
- Relocation or removal by qualified specialists where legally permitted and technically justified;
- Modification of construction design or alignment;
- Additional archaeological monitoring during subsequent excavation;
- Documentation and conservation of artifacts;
- Transfer of artifacts to an approved museum or government repository; and
- Other measures required by the competent authority.

All mitigation measures shall be documented and incorporated into the Contractor's work plan and C-ESMP where applicable.

6. Human Remains and Suspected Burial Sites: The discovery of human remains shall be treated as a high-priority chance find. If human remains, graves or suspected burial sites are encountered:

- Stop all work immediately in the affected area;
- Do not touch, move, remove, clean or expose additional remains;
- Establish and secure an exclusion zone;
- Prevent unauthorized access and public disturbance;
- Immediately notify the Site Supervisor, Contractor's E&S Officer and Employer;
- Notify the relevant competent government authorities;
- Seek assessment and direction from an appropriately qualified authority/specialist;
- Respect applicable cultural, religious and legal requirements concerning human remains; and
- Do not resume work in the affected area until the competent authority provides clearance or instructions.

Where the discovery may represent a recent burial, the project shall also coordinate with the appropriate local administrative and law-enforcement authorities as required by applicable law.

7. Resumption of Work: Construction activities in the affected area shall **not resume** until:

1. The discovery has been adequately assessed;
2. Required protection or mitigation measures have been implemented;
3. The relevant competent authority has provided the required clearance, authorization or instructions; and
4. The Employer/FSRP E&S team has confirmed that the agreed measures have been satisfactorily implemented.

Where the discovery requires continued archaeological monitoring or other conditions, the Contractor shall comply with those requirements throughout the remaining works.

8. Chance Find Register and Documentation: The Contractor shall maintain a Chance Find Register containing, at minimum:

N o.	Da te	Locati on	Descrip tion of Find	GPS Coordin ates	Person Report ing	Immedi ate Action	Autho rity Notifi ed	Assessment/D ecision	Cleara nce Date	Stat us
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All photographs, assessment reports, correspondence, authority instructions, clearance letters and other supporting documentation shall be retained in the project E&S records.

Significant chance finds shall be included in the Contractor's monthly E&S performance reporting and reported through the project's incident/notification mechanisms where applicable.

9. Training and Awareness: Before commencement of earthworks, the Contractor shall provide all workers and relevant subcontractors with a chance-find awareness briefing.

The briefing shall cover:

- What cultural heritage and archaeological materials may look like;
- Potential locations where chance finds may occur;
- The requirement to immediately stop work;
- The requirement not to touch or move discoveries;
- Reporting channels and responsible persons;
- Protection and exclusion-zone requirements;
- Special procedures for human remains; and
- Consequences of unauthorized removal, damage or disturbance of cultural heritage.

Refresher toolbox talks shall be provided where excavation activities are extensive or where a chance find has occurred.

The Contractor shall maintain attendance records for all chance-find training and awareness sessions.