DAWLADA PUNTLAND
EE SOOMAALIYA

PUNTLAND STATE
OF SOMALIA

Ministry of Agriculture and Irrigation

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Somalia Food Systems
Resilience Project "P177816

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Activity Title:

Construction of the Gene Bank Project, Garowe District, Nugal Region

For:

Food Systems Resilience Project (FSRP) – Puntland Component

Date: September 2026

Project Coordinates:
8°24'16.35"N, 48°27'36.12"E

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LIST OF ABBREVIATIONS

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

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1. Executive Summary

The Environmental and Social Management Plan (ESMP) for the Construction of the Gene Bank Project within the existing MoERCC compound has been prepared under the Somalia Food Systems Resilience Project (S-FSRP), financed by the World Bank and implemented by the Federal Government of Somalia and Puntland State. The project aims to strengthen biodiversity conservation through the establishment of a Gene Bank for the conservation, propagation and documentation of native, endemic, threatened and climate-adapted plant species. This ESMP has been prepared in alignment with the S-FSRP Environmental and Social Management Framework (ESMF) and other applicable project environmental and social instruments, ensuring consistency with project screening, mitigation, monitoring, and stakeholder engagement requirements.

The project involves the construction of a 12 m × 8 m nursery and propagation facility with capacity for more than 5,000 seedlings, establishment of a herbarium, demonstration planting, nursery beds and associated facilities, and connection to the existing MoERCC water supply. The project is expected to increase the availability of native and climate-adapted seedlings, conserve local plant genetic resources, support ecosystem and rangeland restoration initiatives, and strengthen institutional capacity for biodiversity conservation and environmental education.

The environmental and social risks associated with the proposed activities are site-specific, predictable, and manageable. Key risks include localized soil disturbance, dust and noise, construction waste, accidental fuel or oil spills, occupational health and safety risks, safety risks to MoERCC staff and visitors, movement of construction materials and equipment, temporary disturbance to normal activities within the MoERCC compound, and labour-related risks. During operation, potential risks include water consumption, plant pests and diseases, introduction or propagation of invasive species, unsustainable collection of native, endemic or threatened plant materials, and nursery and herbarium waste. These risks will be managed through the mitigation and monitoring measures established in this ESMP in accordance with the World Bank ESSs, S-FSRP ESMF, and applicable national and Puntland State requirements.

Key environmental and social management measures include appropriate construction and excavation safety procedures, provision and use of personal protective equipment (PPE), regular toolbox talks, safe work practices, proper waste management, dust and noise control, prevention and management of accidental spills, warning signs and barriers around active work areas, controlled access to construction areas, and coordination with MoERCC management to minimize disruption to normal Ministry activities. During operation, measures will include efficient water use, sustainable plant collection, plant biosecurity, pest and disease management, prevention of invasive species, and appropriate nursery and herbarium waste management. Labour management measures, Workers' Codes of Conduct, and SEA/SH prevention measures will also be implemented throughout the implementation period.

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Stakeholder consultations involving MoERCC staff and other users of the MoERCC compound, confirmed strong support for the project. Stakeholders emphasized the importance of conserving and propagating native, endemic, threatened and climate-adapted plant species, supporting future rangeland restoration and rehabilitation initiatives in Puntland, proper management of construction activities, efficient water use, and appropriate operation and maintenance of the Gene Bank. Stakeholder feedback has been incorporated into the project's environmental and social management measures, particularly in relation to construction safety, dust and noise control, waste management, local employment opportunities, sustainable plant collection, operation and maintenance, and grievance handling.

A functional S-FSRP Grievance Mechanism (GM), including Hotline 3060, is available to project stakeholders. Hotline 3060 operates through two separate sub-lines: one for general project-related complaints, concerns, inquiries, and feedback, and another dedicated exclusively to GBV/SEA/SH-related complaints, which is handled confidentially by the project GBV Officer through a survivor-centred approach. Information on the GM and available grievance channels will be communicated to workers, MoERCC staff, visitors, and other relevant stakeholders throughout project implementation.

Effective ESMP implementation will require coordinated action by the Project Coordination Unit (PCU), MoERCC as the technical owner and host institution, the Contractor, Supervising Engineerand other relevant institutions. The Contractor will be responsible for implementing site-level environmental, social, health and safety requirements through the Contractor's ESMP (C-ESMP), while the PCU environmental and social specialists and Supervising Engineer will monitor compliance and implementation performance. MoERCC will provide technical leadership and oversee the site, biodiversity activities, and subsequent operation and maintenance of the Gene Bank. The total ESMP implementation cost is estimated at USD 3,500, covering environmental and social mitigation measures, monitoring, occupational health and safety, stakeholder engagement, biodiversity protection, and other relevant ESMP implementation activities.

Overall, the ESMP concludes that the Construction of the Gene Bank Project can be implemented with manageable environmental and social risks, provided that the mitigation, monitoring, health and safety, labour management, biodiversity management, and stakeholder engagement measures are effectively implemented. Continued monitoring and reporting will support compliance with applicable national requirements, the World Bank Environmental and Social Standards (ESSs), and relevant S-FSRP instruments. The project is expected to strengthen biodiversity conservation, increase the availability of native and climate-adapted seedlings, support ecosystem and rangeland restoration, improve botanical documentation and environmental learning, and strengthen MoERCC institutional capacity for the sustainable conservation and management of plant genetic resources

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2. Introduction

2.1 Project Overview

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

FSRP supports national and sub-national efforts to improve climate-resilient agricultural production, conservation of indigenous plant resources, market access, and sustainable management of natural resources while addressing vulnerabilities caused by water scarcity, biodiversity loss, land degradation, climate variability, and weak value chains. The project aligns with Somalia's long-term vision of achieving food security and economic stability through sustainable and inclusive development.

The project's design draws from lessons learned from previous resilience and drought response programmes in the Horn of Africa and aims to promote climate-resilient production systems, improved market integration, sustainable natural-resource and biodiversity management, and institutional coordination between key sectors.

In Puntland, under FSRP Subcomponent/Activity 2.2.4, the project is implementing the Construction of the Gene Bank in Garowe, Nugaal Region. The intervention aims to establish and operationalize an Endemic and Threatened Plant Conservation Center to preserve local biodiversity and support the production of climate-adapted, high-quality tree and grass seedlings. The facility will combine nursery and propagation activities, herbarium collection, and demonstration planting of native, endemic and threatened plant species.

The proposed Gene Bank will be constructed within the existing MoERCC compound in Garowe at approximately 8°24'16.35"N, 48°27'36.12"E

The subproject will involve construction of a 12 m × 8 m nursery unit with capacity to accommodate more than 5,000 seedlings at one time. Proposed activities will include construction of the nursery shade structure, seedling beds or benches, access paths and a dedicated herbarium area; provision of a pipeline connection from the existing Ministry water system; and installation of basic nursery materials, watering equipment, propagation facilities and herbarium storage arrangements.

The Gene Bank will support the collection, propagation, conservation and documentation of native, endemic and threatened plant species. Seeds, cuttings and plant specimens will be

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collected from priority ecosystems in Puntland and propagated under controlled nursery conditions. Species records will include information on source location, propagation methods, quantities produced and survival rates. Appropriate measures will be applied to avoid unsustainable collection, introduction of invasive species, and transmission of plant pests and diseases.

The project will also establish a demonstration garden comprising at least 30 endemic and threatened trees/species and a herbarium collection containing at least 15 different types of trees/species. The demonstration and herbarium components will support plant conservation, botanical documentation, environmental education and learning by Ministry staff, students, researchers and other relevant stakeholders.

Water for nursery and demonstration planting will be supplied from the existing water system within the MoERCC compound through a pipeline connection to the Gene Bank. No new water source or shallow well is proposed under the subproject. Water-efficient practices will be applied during operation to support sustainable use of the available water supply.

The construction activities will be undertaken entirely within the existing MoERCC compound on government-controlled land. Based on the environmental and social screening, the proposed works are not expected to require additional land, result in physical or economic displacement, or cause permanent restrictions on access to livelihood resources. Accordingly, no land acquisition or voluntary land donation (VLD) is anticipated.

Stakeholder engagement will involve MoERCC technical departments and staff, FSRP representatives, nursery personnel and other relevant stakeholders. Continued engagement during construction and operation will focus on environmental and social management, safe implementation of construction activities, operation and maintenance of the facility, biodiversity conservation and sustainable management of the Gene Bank.

Overall, the Construction of the Gene Bank in Garowe is expected to generate positive environmental and institutional benefits through conservation and propagation of native, endemic and threatened plant species, increased availability of climate-adapted seedlings, improved botanical documentation, support for ecosystem and rangeland restoration, and strengthened institutional capacity for biodiversity conservation and sustainable natural-resource management.

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

The purpose of this Environmental and Social Management Plan (ESMP) is to identify, evaluate, and manage the environmental and social risks associated with the implementation of the

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Construction of the Gene Bank Project in Garowe. The ESMP ensures compliance with the World Bank Environmental and Social Framework (ESF), particularly the applicable Environmental and Social Standards (ESSs), the WBG Environmental, Health and Safety Guidelines (EHSGs), and Puntland State environmental legislation, including the Environmental Impact Assessment Act (2023).

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

- Minimize adverse environmental and social impacts during construction
- Promote safe, healthy, and inclusive working conditions;
- Ensure systematic monitoring and reporting of environmental and social performance;
- Establish clear institutional responsibilities for ESMP implementation;
- Enhance community engagement and provide accessible grievance mechanisms.

2.3 Scope of the ESMP

This ESMP applies to all phases of Construction of the Gene Bank Project activities, including:

- Site preparation and limited excavation works associated with construction of the Gene Bank within the existing MoERCC compound
- Construction of the 12 m × 8 m nursery unit, including the shade structure, seedling beds or benches, access paths and dedicated herbarium area
- Installation of the water pipeline connection from the existing water supply within the MoERCC compound, watering equipment and associated nursery facilities;
- Management of environmental risks such as dust, noise, construction waste, soil disturbance, water use, and temporary disturbance within the Ministry compound during construction
- Stakeholder engagement, consultations, and grievance mechanism (GM)
- Monitoring, compliance, and institutional arrangements for the long-term sustainability of the Gene Bank facility.

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

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2.4 Methodology

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

a. Field Observations and Site Assessments

A technical team conducted site visits on 16 July 2026 to assess the proposed Gene Bank construction site within the existing MoERCC compound in Garowe. The assessment considered the existing site conditions, available space, existing Ministry facilities, water availability, site accessibility, and potential sensitive receptors within the Ministry compound. GPS coordinates, photographs, and site observations were collected for the proposed Gene Bank location.

b. Desktop Review

A review of relevant documents, including:

- Project concept note and available technical information
- Concept Note for the Establishment of an Seed Bank
- World Bank ESS1–ESS10
- Puntland environmental and labor legislation

The desktop review also confirmed that the Gene Bank will be constructed within the existing MoERCC compound on government-controlled land, with no anticipated land acquisition, physical displacement, economic displacement, or voluntary land donation requirements

c. Environmental & Social Screening

The S-FSRP screening checklist was applied to determine risk levels, ESS applicability, and required mitigation measures. The project was classified as Moderate Risk, considering potential impacts associated with **s**mall-scale civil works, site preparation and excavation, dust and noise, construction waste, occupational health and safety, interaction with Ministry staff and visitors, water use**.**

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d. Stakeholder Consultations

Meetings with MoERCC representatives, technical staff, FSRP representatives were conducted to:

- Discuss the proposed Gene Bank construction
- Discuss environmental and social risks
- Share information on the Grievance Mechanism (GM), including the FSRP Hotline 3060;
- Confirm stakeholder support for the proposed Gene Bank Project

2.5 Project Activity Description

The proposed Construction of the Gene Bank Project aims to establish an Endemic and Threatened Plant Conservation Center within the existing MoERCC compound in Garowe. The intervention is designed to support the conservation, propagation and documentation of native, endemic and threatened plant species and to increase the availability of climate-adapted, high-quality tree and grass seedlings for biodiversity conservation and ecosystem restoration.

The works will be limited to the designated project footprint within the existing MoERCC compound and are expected to be completed within a short implementation period. The construction activities will mainly involve site preparation, limited excavation, construction of the nursery structure, seedling beds or benches, access paths, a dedicated herbarium area, and installation of the required water connection and nursery facilities. No borrow pits, batching plants, major vegetation clearance, or workers' camps are anticipated. Materials will be stored securely on site, and generated waste will be collected and transported to an appropriate disposal facility.

Construction activities will be planned and managed to minimize disturbance to normal activities within the MoERCC compound. The construction area will be appropriately demarcated, access will be controlled, and safe movement of Ministry staff, visitors and workers will be maintained throughout the construction period.

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Key project components include:

- **Nursery and Propagation Facility:**
  Construction of a 12 m × 8 m nursery unit with capacity to accommodate more than 5,000 seedlings at one time, including a shade structure, seedling beds or benches, access paths, propagation arrangements and associated nursery facilities.

- **Water Supply and Nursery Facilities:**
  Provision of a pipeline connection from the existing water supply within the MoERCC compound, together with watering equipment and other basic nursery materials required for operation of the facility.

- **Commissioning and Handover:**
  Inspection, testing and commissioning of the completed Gene Bank facilities, water connection and nursery arrangements to confirm functionality before handover for operation and maintenance by MoERCC.

Water Rehabilitation – Workforce Composition

The implementation of the Construction of the Gene Bank Project activities will engage an estimated 20 workers during peak periods. The workforce composition is as follows

- **Total workers:** 20
- **Skilled workers:** 8
- **Unskilled workers:** 10
- **Engineers and site management team:** 2

In terms of origin:

- **Local community workers:** 18 (mainly unskilled and semi-skilled labor)
- **Workers from outside the project area:** 2 (engineers and site management staff only)

The project will prioritize local recruitment, where feasible, particularly for unskilled and semi-skilled positions, to reduce labor influx and associated social risks, including GBV/SEA/SH, in accordance with ESS2 and relevant provisions of ESS4 and ESS10. Recruitment opportunities will be communicated transparently through engagement with relevant local authorities, Vulnerable and Disadvantaged Groups (VDGs), and the responsible labor and youth departments.

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The contractor will also promote equal employment opportunities for women, youth, persons from vulnerable groups, and other qualified local workers, where appropriate. Opportunities may include unskilled and semi-skilled construction activities and support functions such as site administration, waste management, cleaning and catering services. Recruitment will be based on fair and transparent procedures, without discrimination, and all workers will be required to comply with the project Code of Conduct, including provisions on SEA/SH.

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3. Policy, Legal and Administrative Framework

3.1 Introduction

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

3.2 National Legal and Regulatory Framework

a. Provisional Constitution of Somalia

The Provisional Constitution provides the supreme legal framework governing all development activities in Somalia. The following articles are directly relevant to this project:

- **Article 10 Human Dignity:** Human dignity is inviolable and must be protected by all. State power must not be exercised in a manner that violates human dignity. This underpins all worker and community protection measures in this ESMP.
- **Article 11 Equality:** All citizens shall have equal rights and duties before the law regardless of sex, religion, social or economic status, clan, disability, or occupation. The project will ensure non-discrimination in labor recruitment and community engagement.
- **Article 24 Labor Relations:** Every person has the right to fair labor relations. Women have a special right of protection from sexual abuse, segregation, and discrimination in the workplace. This directly supports the project's SEA/SH prevention measures and Workers' Code of Conduct.
- **Article 27 Economic and Social Rights:** Recognizes the right to clean portable water and requires that women, the aged, disabled, and minorities who have suffered discrimination be supported to realize their full potential. The project will ensure inclusion of vulnerable groups in consultations and that project benefits reach all community members equitably.
- **Article 31Language and Culture:** The State shall promote positive cultural practices whilst eliminating customs that negatively impact community wellbeing. The project's community engagement approach respects local customs and traditional governance structures.
- **Article 32 Right of Access to Information:** Every person has the right of access to information held by the State. This supports the project's information disclosure obligations under ESS10 and the Grievance Mechanism.
- **Article 43 Land:** Land is recognized as a primary resource and basis of people's livelihoods, to be held, used, and managed in an equitable, efficient, productive, and sustainable manner. The project will ensure that all land-related aspects are managed in accordance with this provision and applicable ESF standards.

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- **Article 45 Environment:** The government shall give priority to the protection, conservation, and preservation of the environment. All people have a duty to safeguard the environment. The project supports this article through its environmental management and mitigation measures.
- **Article 111J Office of the Ombudsman:** The Ombudsman investigates complaints against government workers regarding violations of basic rights, abuse of power, and corruption. This provides an additional redress avenue beyond the project-level Grievance Mechanism.

b. Federal Level Legislation

- **Environmental Protection and Management Act, 2024**
  This Act guarantees the right to a clean, safe, and healthy environment and provides requirements for waste management including hazardous wastes. It requires application of the polluter-pays and precautionary principles in environmental management. The project adheres to all relevant requirements prescribed by this Act through its mitigation and monitoring measures.
- **Environmental and Social Impact Assessment and Audit Regulations (ESIA), 2024**
  Part III, Regulations 13, 16, and 17 guide public participation and collection and incorporation of views from the general public. The project's stakeholder consultation process, documented in Section 8 and the relevant annexes, is consistent with these requirements.
- **Somali Labour Code (Law No. 36 of 2024)**
  This law governs fair labor relations, safe working conditions, prohibition of child and forced labor, and worker rights. It directly informs the project's Labor Management Procedures (LMP) and aligns with World Bank ESS2.
- **Somalia National Gender Policy, 2016**
  This policy includes strategies to eradicate harmful traditional practices such as FGM/C and child marriage, and to improve services for the management of GBV/SEA/SH cases. The project's SEA/SH prevention measures, Workers' Code of Conduct, and survivor-centered GM pathway are consistent with and support this policy.
- **Somali Penal Code**
  The Somali Penal Code criminalizes sexual violence, harassment, and abuse. Any SEA/SH incidents arising in the context of this project may be referred to the formal legal system in accordance with the Penal Code, where the survivor consents to such referral. The project's GM includes provisions for confidential referral pathways consistent with survivor-centered principles.
- **Public Health Legislation**
  Federal public health legislation supports prevention of disease transmission, protection of community health and safety, and environmental sanitation practices. The project contributes to these objectives through its community health and safety measures and environmental mitigation measures during implementation.

c. Puntland State Legislation

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- **Puntland Environmental Management Law, 2023**
  This law provides a comprehensive framework for conservation of natural resources, pollution prevention, waste management, protection of soil, vegetation, and water resources, and enforcement of environmental standards. The project complies with this law through its environmental management and mitigation measures.
- **Puntland Labour Law, 2004**
  This law sets minimum requirements for safe and healthy working conditions, worker rights and responsibilities, prohibition of forced and child labor, and provision of appropriate PPE and medical care. It aligns closely with World Bank ESS2 and informs the contractor's Labor Management Procedures covering prohibition of child and forced labor, non-discrimination, OHS provisions, worker rights, and a dedicated Workers' GM separate from the community GM.
- **Puntland Water Resources Act, 2003**
  This Act regulates the sustainable use of piped and groundwater resources, protection of water infrastructure, and prevention of contamination from waste disposal. The project supports this Act through its water resource management and protection measures.
- **Puntland Public Health Law, 2007**
  This law supports prevention of disease transmission, protection of community health and safety, and environmental sanitation practices. The project contributes through its community health and safety measures and improved environmental conditions during implementation.
- **Puntland Urban Planning and Construction Code, 2018**
  This code governs site preparation, construction safety, and environmental compliance during works. The contractor must comply with this code throughout the implementation phase of the project.
- **Puntland Disaster Risk Management Policy, 2024**
  This policy emphasizes integration of climate resilience and disaster preparedness into development projects, community-based early warning systems, and strengthening of institutional capacity for hazard mitigation. The project supports these objectives through its design and mitigation measures.

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3.3 World Bank Environmental and Social Framework (ESF)

The ESF comprises ten Environmental and Social Standards (ESSs). The following ESSs are applicable to the Construction of the Gene Bank Project Village, Garowe District:

Table 1: WB ESSs

ESS	Title	Relevance to the Project
ESS1	Assessment and Management of Environmental and Social Risks and Impacts.	Provides the overarching framework for ESMP preparation.
ESS2	Labor and Working Conditions	Applies to all project workers, direct and indirect; governs OHS, fair treatment, and labor rights.
ESS3	Resource Efficiency and Pollution Prevention	Relevant for waste management, energy, water and resources use, including soil protection.
ESS4	Community Health and Safety	Applies to manage community health and safety of the surrounding communities from contagious diseases through worker-community interaction during implementation and physical security.
ESS5	Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	Not applicable. The proposed Gene Bank will be constructed entirely within the existing MoERCC compound on government-controlled land. No additional land acquisition, physical or economic displacement, restrictions on land use, or voluntary land donation (VLD) are anticipated.
ESS6	Disturbance to vegetation and fauna associated with Gene Bank sites.	Relevant with low risk. However, works will be confined to the existing footprint and vegetation disturbance minimized.
ESS8	Accidental uncovering of objects of cultural and/or archaeological value	Relevant with low risk. However, the project will apply a Chance Finds Procedure if any cultural or archaeological material is encountered.
ESS10	Stakeholder Engagement and Information Disclosure	Mandatory consultations and GM integration throughout the project.

3.4 International Conventions and Agreements

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

- **Convention on Biological Diversity (CBD)** – sustainable management of natural resources

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- **United Nations Framework Convention on Climate Change (UNFCCC)** – adaptation and low-carbon development
- **United Nations Convention to Combat Desertification (UNCCD)** – soil and farm plots and area protection
- **Basel Convention** – controls on hazardous waste disposal
- **ILO Conventions** – protection of worker rights and occupational safety

The project supports Somalia's commitments under these instruments by incorporating climate-smart technologies, adhering to safe labor practices, and managing waste responsibly.

4. Project Area Description

4.1 General Location

The proposed Construction of the Gene Bank Project will be implemented within the existing compound of the Ministry of Environment, Range and Climate Change (MoERCC) in Garowe

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District, Nugaal Region, Puntland State of Somalia. The project site is located within an established government institutional compound and will accommodate the proposed Gene Bank.

The proposed Gene Bank will be constructed on a designated site within the existing MoERCC compound. The facility will comprise a 12 m × 8 m nursery unit, including nursery and propagation areas, a dedicated herbarium area and associated demonstration planting. The project will also utilize the existing water supply within the MoERCC compound through a pipeline connection to support nursery watering and plant propagation activities.

The project area is accessible through the existing road network and internal access within the MoERCC compound, which will facilitate the movement of workers, construction materials and equipment required during project implementation.

GPS coordinates recorded for the proposed Gene Bank site are **8°24'16.35"N, 48°27'36.12"E.**



Figure 1: Gene Bank site map

4.2 Land Ownership and Tenure

The proposed Gene Bank will be constructed within the existing MoERCC compound in Garowe District, Nugaal Region. The project site is government-owned land under the institutional control and management of MoERCC. The proposed construction and associated facilities will remain

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within the designated project footprint inside the existing Ministry compound, and no additional land will be required for project implementation.

The project does not involve land acquisition, voluntary land donation (VLD), physical displacement, economic displacement, or restrictions on land use or access. Accordingly, ESS5 is not considered applicable to the Gene Bank Project. Site verification confirmed that the proposed works will be undertaken within the existing MoERCC compound without affecting private or community land, access rights, assets, or livelihoods.

The land ownership and tenure status confirms that:

- The proposed Gene Bank site is located entirely within the existing MoERCC compound
- The land is government-owned and under the institutional control of MoERCC
- No land acquisition, physical displacement, economic displacement, or loss of private or community assets will occur
- No permanent restrictions on access to land or livelihood resources are anticipated
- Construction activities will be confined to the designated Gene Bank site within the Ministry compound.

As no land acquisition or land donation is required, no VLD documentation is necessary. Evidence confirming the land ownership and tenure status of the Gene Bank site is provided as an annex to this ESMP**.** All project activities will be implemented within the designated project footprint in a manner that avoids adverse impacts on land use, access rights, assets, or livelihoods.

4.3 Accessibility and Infrastructure

Access Roads

The Gene Bank site is located within the existing MoERCC compound in Garowe and is directly accessible by an existing asphalt road. Internal access within the Ministry compound provides convenient access to the proposed construction site. The site is accessible throughout the year, facilitating the movement of workers, construction materials, equipment, Ministry staff and visitors during project implementation and operation.

Water Supply

Water supply is already available within the existing MoERCC compound. The Gene Bank will utilize the existing Ministry water supply through a pipeline connection to support nursery watering, plant propagation and demonstration planting. No new water source, borehole or shallow well will be developed under the project

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Electricity

Electricity is available within the MoERCC compound. The existing electricity supply will support the basic operational requirements of the Gene Bank where electrical power is required. No separate solar-powered water pumping system is proposed as part of the Gene Bank construction.

Communication and Internet

Mobile network and internet services are generally available in Garowe and within the MoERCC compound, providing adequate communication for construction supervision, coordination, reporting and routine operation of the Gene Bank.

4.4 Social Conditions

- **Socio-economic Context**: The Gene Bank is located within the existing MoERCC compound in Garowe, an urban administrative and commercial centre in Nugaal Region. The surrounding area is characterized by government institutions, residential areas, commercial activities and public services. The project is intended primarily to strengthen institutional capacity for biodiversity conservation, plant propagation and environmental learning
- **Livelihoods:** The project site itself is within government-controlled institutional land and is not used for private agricultural, commercial, grazing or other livelihood activities. Therefore, construction of the Gene Bank is not expected to result in loss of livelihoods, economic displacement, or restriction of access to livelihood resources. The operational Gene Bank is expected to provide wider benefits by supporting the production of native and climate-adapted seedlings for ecosystem and rangeland restoration initiatives
- **Women and Youth:** Women and youth will be encouraged to participate in stakeholder engagement and, where feasible, access appropriate employment opportunities during construction and operation. The contractor will promote fair and non-discriminatory recruitment for suitable skilled, semi-skilled and unskilled positions
- **Access to Basic Services:** As the project is located within Garowe and within the existing MoERCC compound, the site has access to existing road, water, electricity, mobile communication and other basic urban services. The site is directly accessible from an asphalt road, facilitating movement of workers, materials and equipment
- **Gender-Based Violence (GBV):** No significant GBV concerns were identified during stakeholder consultations. Nevertheless, the project will implement SEA/SH risk prevention and response measures, including worker awareness, a signed Workers' Code of Conduct, appropriate worker-staff and public interaction requirements, and an accessible and confidential Grievance Mechanism (GM) for GBV/SEA/SH cases, in accordance with applicable World Bank requirements

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- **Cultural Heritage:** No known cultural heritage sites, archaeological resources, or culturally significant locations were identified within the project area. A Chance Finds Procedure will be included in the Contractor's ESMP. See a sample Chance Finds procedure in the annexes.
- **Security:** The project site is located within the existing MoERCC compound in Garowe. Project activities will be coordinated with MoERCC management and relevant authorities to ensure safe implementation and appropriate management of site access and security
- **Community Health and Safety:** The project is expected to generate positive social benefits through strengthened biodiversity conservation, increased production and availability of native and climate-adapted seedlings, improved environmental education and support for ecosystem and rangeland restoration. Potential health and safety risks during construction may include movement of workers and construction materials, dust and noise, excavation and open work areas, construction equipment, and interaction between project workers, Ministry staff and visitors**.** These risks will be managed through appropriate site safety measures, warning signs and barriers, site demarcation, controlled access to active work areas, and coordination with MoERCC during construction.
- **Grievance Mechanism:** The S-FSRP Hotline 3060 serves as the project's Grievance Mechanism and operates through two separate sub-lines. One sub-line is designated for general project-related complaints, concerns, inquiries, and feedback, while the second sub-line is dedicated exclusively to GBV/SEA/SH-related complaints and is handled by the project GBV Officer. This arrangement ensures that general grievances are addressed through the standard project GM procedures, while GBV/SEA/SH-related cases are managed through a separate, confidential, and survivor-centred pathway. Information on Hotline 3060 and the available grievance channels will be communicated to farmers, workers, community members, and other stakeholders throughout project implementation.

4.5 Physical and Biophysical Environment

Topography and Soil

The project area is characterized by generally flat to gently sloping terrain within the existing MoERCC compound in Garowe. Soils in the area are generally sandy to sandy-loam, consistent with the arid and semi-arid conditions of the wider Garowe area. The proposed Gene Bank site is located within an already established government compound. Localized soil disturbance is expected during site preparation, foundation works, limited excavation, construction of access paths and installation of the water pipeline connection. Disturbed areas will be appropriately backfilled, compacted and restored following completion of construction activities.

Water Supply System

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Water is available within the existing MoERCC compound and will serve as the water source for the Gene Bank. The project will provide the required pipeline connection from the existing Ministry water system to support nursery watering, plant propagation and demonstration planting. No new borehole or shallow well will be constructed under the project. Water-efficient watering practices will be applied during operation to minimize unnecessary water consumption.

Climate

Garowe experiences a semi-arid climate similar to the wider Nugal area, characterized by:

- Two rainy seasons: *Gu* (rainy season) (April–June) and *Deyr* (rainy season) (October–December)
- Two dry seasons: *Jilaal* (January–March) and *Hagaa* (July–September)
- High temperatures and generally hot and dry conditions
- Variable and erratic rainfall patterns with recurrent periods of drought and water stress.

These climatic conditions underscore the importance of reliable water supply infrastructure and sustainable groundwater management.

Hydrology and Drainage

The proposed Gene Bank will be constructed within the existing MoERCC compound and will utilize the existing Ministry water supply. The small project footprint and limited excavation works are not expected to significantly alter existing drainage patterns. During construction, appropriate drainage and erosion-control measures will be implemented to prevent localized water accumulation, soil erosion and sediment movement, particularly during rainfall events.

Wildlife

Given the location within an existing urban government compound, wildlife presence at the construction site is expected to be limited mainly to common bird species. Construction activities will be confined to the designated project footprint and unnecessary disturbance or harm to fauna will be avoided.

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5. Evaluation of Environmental and Social Impacts

5.1 Introduction

This section evaluates the potential environmental and social impacts associated with the implementation of the Construction of the Gene Bank Project during the construction. The assessment considers the project's physical setting, socio-economic context, proposed activities, and sensitivities identified during field observations and stakeholder consultations.

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

Overall, the project is classified as Moderate Risk, with impacts that are predictable, site-specific, and manageable through the mitigation measures outlined in this ESMP. In accordance with ESS1, environmental and social risks and impacts will be assessed, managed, monitored and reviewed throughout the project lifecycle

5.2 Positive Impacts

The implementation of the Gene Bank Project is expected to generate important environmental, social and institutional benefits, including:

a. Biodiversity Conservation

- Conservation and propagation of native, endemic and threatened plant species.
- Improved preservation of local plant genetic resources and biodiversity.
- Establishment of a dedicated facility for long-term conservation and documentation of priority plant species.

b. Increased Production of Native and Climate-Adapted Seedlings

- Capacity to accommodate more than 5,000 seedlings at one time.
- Increased availability of native and climate-adapted tree, shrub and grass seedlings.
- Provision of suitable planting materials to support restoration and tree-planting initiatives.

c. Support for Ecosystem and Rangeland Restoration

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- Improved availability of indigenous plant species suitable for restoration of degraded ecosystems and rangelands.
- Support for soil stabilization, vegetation restoration and ecological recovery initiatives.
- Strengthened resilience of natural ecosystems to drought, land degradation and climate variability.

d. Plant Documentation and Knowledge Conservation

- Establishment of a dedicated herbarium for collection, preservation, labeling and documentation of plant specimens.
- Improved records on native, endemic and threatened plant species, including their origin, ecological role and conservation status.
- Preservation of botanical information and institutional knowledge for future conservation activities.

e. Employment Opportunities

- Creation of short-term employment opportunities during construction of the Gene Bank.
- Potential employment and skills-development opportunities associated with nursery establishment, planting, maintenance, cleaning and other support activities.
- Promotion of participation of women, youth and vulnerable groups in appropriate employment opportunities, where feasible.

f. Capacity Building and Environmental Education

- Strengthened capacity of MoERCC staff in nursery management, plant propagation, species documentation and biodiversity conservation.
- Provision of a practical learning and demonstration facility for government staff, students, researchers and other stakeholders.
- Improved awareness and knowledge of the importance of conserving Puntland's native, endemic and threatened plant species.

g. Environmental Benefits

- Establishment of demonstration planting comprising at least 30 endemic and threatened trees/species.
- Contribution to ex-situ conservation of threatened and endemic plant species.
- Support for climate resilience, biodiversity conservation and sustainable management of natural resources.

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

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

Table 2: Negative Environmental and Social Impacts and Risk Assessment

Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
Foundation and Site Excavation Disturbance	Site preparation, foundation works and limited excavation may cause localized soil disturbance, erosion or compaction	Excavation for foundations, access paths and water pipeline connection.	Implementation	ESS3; ESS4	Physical environment; Project workers; MoERCC staff and visitors	Medium	Low
Dust Emissions	Dust generated from excavation, movement of construction materials and other site activities may affect nearby areas.	Earthworks, material handling and movement of workers and vehicles on dry surfaces.	Implementation	ESS2; ESS4	Project workers; MoERCC staff and visitors	Medium	Low
Noise (Minor)	Temporary noise and vibration may occur during construction activities.	Use of hand tools, construction equipment, material handling and vehicle movements	Implementation	ESS2	Project workers	Low	Low
Labour Disputes	Disputes related to payment, overtime,	Delays in payment,	Implementation	ESS2,	Project workers,	Medium	Low

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Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
(Payment, Overtime, Working Conditions)	and working conditions may disrupt works.	unclear contracts, or poor conditions may cause worker grievances.		ESS4	MoERCC staff and visitors		
Occupational Health & Safety (OHS) Risks	Workers may be exposed to injuries, falls, manual-handling risks, excavation hazards, tools, dust, heat exposure and other construction hazards.	Construction activities, handling of materials and equipment, working at height during installation of the nursery structure, and exposure to hot weather.	Implementation	ESS2	Project workers	Medium	Low
Community Health & Safety Risks	Open excavations, construction materials and active work areas may pose safety risks to MoERCC staff, visitors and other persons accessing the compound.	Uncontrolled access to active construction areas, material stockpiles, excavation and movement of workers and materials.	Implementation	ESS4	MoERCC staff, visitors and other site users	Medium	Low
Potential SEA/SH Risks	Low risk associated with interaction between project workers, Ministry staff and other persons accessing the compound if not properly managed.	Presence of contracted workers and inadequate enforcement of worker Code of Conduct and SEA/SH requirements..	Implementation	ESS2; ESS10	Workers, Ministry staff and visitors, particularly women and vulnerable persons	Low	Low

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Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
Pollution: Solid Waste	Cement bags, packaging, construction debris, food waste and other materials may generate solid waste.	Construction and worker activities without adequate waste segregation, collection and disposal..	Implementation	ESS3	Physical environment, MoERCC compound	Low	Low
Pollution: Fuel/Oil Spills	Accidental leakage of fuel, lubricants or oil from construction vehicles or equipment may contaminate soil.	Unsafe storage or handling of fuels near sensitive areas.	Implementation	ESS3	Physical environment	Low	Low

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6. Environmental and Social Management Plan (ESMP)

6.1 Overview of Key Environmental and Social Risks and Impacts

The implementation of the Construction of the Gene Bank Project activities will generate a range of environmental and social risks requiring careful management. Key risks include localized soil disturbance and excavation, dust emissions, noise and vibration, construction waste, accidental fuel or oil spills, occupational health and safety (OHS) risks, health and safety risks to MoERCC staff and visitors, movement of construction materials and equipment, temporary disturbance to normal activities within the MoERCC compound, labour management issues, SEA/SH risks, and accidental cultural heritage chance finds.

During operation of the Gene Bank, additional environmental risks may arise from water consumption for nursery activities, plant pests and diseases, introduction or propagation of invasive species, unsustainable collection of native, endemic or threatened plant materials, and management of nursery and herbarium waste. These risks will require appropriate biodiversity conservation, plant biosecurity, resource-efficiency and waste-management measures in accordance with ESS3 and ESS6.

No armed security personnel will be used on this project, which reduces ESS4 security risks on deployment of security personnel. Access to the construction area will be controlled in coordination with MoERCC management through the existing compound access arrangements, site demarcation, warning signage and restriction of unauthorized persons from active work areas. Any security-related incidents will be coordinated with MoERCC management and relevant authorities in accordance with project procedures.

Hazardous materials, including fuels, oils, lubricants and other potentially polluting substances used during construction, will be properly labelled, stored in secure and leak-proof containers, and kept in designated areas with appropriate secondary containment. Workers handling such materials will use appropriate PPE. Spill-prevention and response measures will be implemented, and hazardous materials and wastes will be protected from rain, runoff and unauthorized access and disposed of through appropriate waste-management arrangements.

The intervention involves small-scale construction within the existing MoERCC compound and establishment of a nursery, herbarium and demonstration planting facility for the conservation and propagation of native, endemic and threatened plant species.

These risks are generally predictable, site-specific, and manageable through the mitigation measures outlined in this ESMP. Positive impacts include conservation and propagation of native, endemic and threatened plant species; increased production of native and climate-adapted seedlings; support for ecosystem and rangeland restoration; establishment of a dedicated

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herbarium and demonstration planting area; strengthened biodiversity knowledge and institutional capacity; environmental education and research opportunities; and short-term employment opportunities during construction

6.2 Mitigation and Monitoring Plan

The following table presents the consolidated ESMP for the Construction of the Gene Bank Project in Garowe District, Nugaal Region. It incorporates the environmental and social risks identified in Chapter 5, including soil and excavation disturbance, dust and noise, construction waste, pollution risks, OHS, health and safety risks to MoERCC staff and visitors, labour and SEA/SH risks, water-use pressure, cultural heritage chance finds, and temporary disturbance to activities within the MoERCC compound**.** Each risk is accompanied by mitigation measures, monitoring method, frequency, responsible party, monitoring indicator, reporting line, and estimated cost.

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Table 3: ESMP Mitigation and Monitoring Plan in Gene Bank

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
ESS1	Inadequate E&S capacity and arrangements to effectively assess, manage, monitor and report environmental and social risks and compliance throughout the project lifecycle.	Assign qualified E&S personnel; prepare and implement the C-ESMP before mobilization; conduct E&S induction and toolbox talks; undertake regular supervision and monitoring; maintain E&S records and promptly implement corrective actions for identified non-compliance	Review of C-ESMP, E&S staffing, monitoring records, inspection reports and corrective-action records	Monthly and throughout construction	Contractor / SE / PCU	Qualified E&S personnel assigned; approved C-ESMP in place; regular monitoring conducted; identified non-compliances addressed and documented.	Monthly E&S report by Contractor to SE and PCU.	300
ESS3, EHSGs	Soil disturbance, erosion and compaction from site preparation, foundation excavation and	Assign qualified E&S personnel; Contractor to prepare and implement C-ESMP before mobilization; minimize excavation and construction footprint; stockpile excavated material safely; backfill and compact excavations promptly; stabilize	Site inspection checklist; visual observation of ground stability; review of C-ESMP.	Weekly during construction	Contractor/PCU Contractor only	C-ESMP in place; Excavated areas reinstated; no visible erosion or uncontrolled surface disturbance.	Monthly E&S site report by Contractor to SE and PCU.	300

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	installation of the water pipeline connection.	and restore disturbed areas following completion of works.						
ESS3	Dust emissions from excavation, material handling, vehicle movements and other construction activities may affect workers, MoERCC staff and visitors	Apply water spraying to active dusty areas when necessary; cover or appropriately manage dusty materials; limit vehicle speeds within the compound; minimize unnecessary vehicle movements; and suspend excessively dusty activities during strong winds	Visual observation; community complaint log review.	Daily during construction	Contractor	Low visible dust levels; appropriate PPE used; no unresolved dust complaints from MoERCC staff or other stakeholders.	Daily site log; dust complaints recorded in GM log and reported weekly to SE.	500
ESS2, ESS4	Noise and vibration from construction activities, equipment and material movement may temporarily disturb workers,	Restrict noisy works to normal daytime working hours; maintain equipment in good condition; avoid unnecessary idling; provide hearing protection where required; inform MoERCC management in advance of particularly noisy activities.	Community complaint log review; verification of working hours.	Daily during construction	Contractor	No noise complaints from community; works consistently within 08:00-17:00.	Daily site log; noise complaints recorded in GM log and reported weekly to SE.	200

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	MoERCC staff and visitors.							
ESS3	Improper management of construction, packaging and domestic waste may cause littering, soil contamination and deterioration of conditions within the MoERCC compound..	Collect all waste in designated receptacles; segregate organic (compost) from non-organic (transport to nearest approved disposal facility in town); prohibit open burning and dumping in wadis; maintain daily waste log. Fuel: store in pipe networked containment min 50m from water sources; maintain spill kit on site; designated refuelling area only; immediate clean-up and reporting of spills.	Weekly site inspection checklist; waste log review; visual check for oil stains near fuel storage; spill kit present check.	Weekly; immediate reporting of spills	Contractor/ SE/PCU	Waste collection point present and in use; no visible litter; no oil stains near fuel storage; waste log maintained; no open burning observed.	Weekly E&S site report; spill incidents reported to SE and PCU within 24 hours.	200
ESS2	Child and forced labour risk: employment of workers below minimum age (18 years) or	Verify age of all workers before hiring using official identification; maintain worker registry with age verification records; prohibit child labour and forced labour both are grounds for immediate dismissal; prioritize local hiring with written contracts specifying	Review of worker registry and contracts; random spot checks of worker ID; worker interviews on employment terms.	Pre-works; monthly spot checks	Contractor/SE/PCU	Worker registry complete with verified ages; no workers under 18 on site; all workers hold signed contracts.	Monthly labour compliance report by Contractor to SE and PCU.	200

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	under coercive conditions.	employment terms, wages, working hours and grievance rights; post minimum age requirement visibly at site.						
ESS2	Poor working conditions, excessive hours, employment discrimination, disputes related to pay, working hours, and lack of workers' Grievance Mechanism (GM).	Ensure all workers informed of employment terms before starting; comply with applicable labour laws on working hours; prohibit discrimination on grounds of gender, clan, age or disability; establish a workers' GRM separate from community GM with named focal person and clear escalation path; post workers' GM contact details at site; resolve pay disputes within 7 days. This will be addressed in the GM section	Review of worker complaint logs; interview sample of workers; verify workers' GRM posted and functional.	Monthly	Contractor/ SE	No unresolved pay disputes; workers' GRM operational and known to workers; no discrimination complaints.	Monthly labour compliance report by Contractor to SE and PCU.	300
ESS2	OHS risks: heat stress, fatigue, manual handling injuries, cuts and falls during stone work.	Provide adequate drinking water (min 3 litres/worker/day); enforce 30-minute rest break every 2 hours during peak heat (10:00-15:00); provide PPE (gloves, safety boots, sun hats); conduct weekly toolbox talks on safe manual handling; maintain stocked first-	Daily site inspection; incident log review; PPE spot check; toolbox talk attendance register.	Daily	Contractor/SE	No heat-related or OHS incidents; PPE in use; weekly toolbox talks held; first-aid kit stocked.	Daily site log; incidents reported to SE and PCU/ within 24 hours.	500

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		aid kit on site; ensure workers know emergency procedures. PPE, site safety and equipment use protocols, health welfare and ensurance, clear code of conduct						
ESS2; ESS10	SEA/SH, harassment or worker misconduct arising from interaction among project workers, MoERCC staff, visitors and other stakeholder	All workers sign Code of Conduct (CoC) before starting work and receive induction training. CoC prohibits: SEA/SH, sexual relations with minors, exchange of favours for sex, harassment and discrimination. Disciplinary measures include immediate dismissal. Obligation to report SEA/SH through confidential GM pathway stated in CoC. Minimum working age is 18. Conduct SEA/SH awareness sessions for workers and community monthly. SEA/SH GM pathway is confidential, survivor-centred, does not require written evidence.	Review of signed CoC records; attendance register for awareness sessions; GM log review for SEA/SH cases.	CoC signing: pre-works. Awareness sessions: monthly. GM log: continuous.	Contractor/SE/PCU	All workers signed CoC before work start; induction completed; no unresolved SEA/SH cases; confidential pathway operational.	Monthly safeguards report to SE and PCU; SEA/SH incidents reported within 24 hours through confidential pathway.	200
ESS4	Traffic and safety risks from delivery vehicles and movement of	Control vehicle speed; provide warning signs; schedule major deliveries to minimize interference with normal compound activities; use a flag	Vehicle speed and signage check; driver license verification.	During material delivery and	Contractor	No traffic incidents; warning signs in	Weekly E&S site report.	200

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	construction materials within and around the MoERCC compound.	person where necessary; ensure vehicles are roadworthy and drivers appropriately licensed; maintain safe pedestrian access..		vehicle movements		place; vehicles roadworthy.		
ESS4	Security and unauthorized access to construction areas, materials or equipment.	No armed security personnel are anticipated. Manage construction-site access through the existing MoERCC compound arrangements, barriers, signage and coordination with MoERCC management. Secure construction materials, tools and equipment after working hours and report security incidents through established procedures.	Confirm no armed security present at site.	Project start; monthly spot check	PCU/ Contractor	No armed security on site; access managed through community-based mechanisms.	Noted in project inception report; monthly safeguards report.	200
ESS4	Temporary disruption to normal MoERCC activities and movement within the Ministry compound.	Coordinate work schedules with MoERCC management; maintain access to Ministry offices and facilities; clearly separate construction and operational areas; schedule material deliveries appropriately; promptly communicate activities that may temporarily affect access or normal Ministry operations.	Site inspection; consultation with MoERCC management; complaints/GM review.	Weekly during construction	PCU/ Contractor	Access to Ministry facilities maintained; construction footprint controlled; no prolonged or unresolved disruption complaints.	Weekly E&S site report	200

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
ESS10	Inaccessible Grievance Mechanism (GM), insufficient stakeholder engagement, and inadequate disclosure of project documents.	Display GM information (FSRP Hotline 3060) at project site and community gathering points; hold community meetings before and during works; designate GM focal person known to community; ensure project documents available for community review on request; record all grievances in GM register; acknowledge within 48 hours; resolve within 7-14 days; escalate unresolved cases to District Administration and PCU. Stakeholder SEPs, transparent information disclosure, inclusive consultations, accessible GRM channels, enforce zero tolerance policies against coercion, threats discrimination or GBV/SEAH	GM register review; community meeting attendance records; site GM information display check.	GM: continuous. Community meetings: project start, mid-point, end. Display check: monthly.	PCU /Contractor	GM information displayed and accessible; community meetings held per schedule; all grievances acknowledged within 48 hours; no unresolved cases beyond 14 days.	Monthly safeguards report by PCU to World Bank; GM summary included.	200

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6.3 ESMP Implementation Budget

The implementation of the Environmental and Social Management Plan (ESMP) for the Construction of the Gene Bank Project requires financial resources to support mitigation and monitoring measures during construction and initial operation, including site safety, occupational health and safety (OHS), waste management, pollution prevention, environmental and social monitoring, stakeholder engagement.

The total cost for implementing ESMP measures is estimated at USD 3,500, covering key activities such as PPE provision, site safety measures, waste management, worker induction and toolbox talks, stakeholder engagement and GM awareness, environmental and social monitoring. These costs are indicative and may be adjusted within the overall ESMP budget according to actual implementation requirements.

Following completion of construction, responsibility for the environmental and social management of the Gene Bank will be integrated into routine MoERCC operations. MoERCC will oversee sustainable plant collection, nursery management, water-use efficiency, plant pest and disease control, invasive species prevention, herbarium management, and maintenance of biodiversity records. Routine operational monitoring will be undertaken by relevant MoERCC technical staff as part of the management and maintenance of the Gene Bank, without significant additional ESMP costs.

6.4 Grievance Mechanism (GM)

A project-level Grievance Mechanism (GM) has been established to enable project workers, MoERCC staff, visitors, and other stakeholders to raise concerns related to the construction and operation of the Gene Bank Project. The GM will be accessible, transparent, culturally appropriate, free of charge, and implemented in accordance with the S-FSRP Stakeholder Engagement Plan (SEP) and World Bank ESS10. It aims to provide timely resolution of grievances, strengthen accountability, and maintain constructive engagement with project stakeholders.

General grievances may relate to construction impacts such as dust, noise, waste management, access restrictions, occupational and public health and safety, labour and employment issues, worker conduct, discrimination, damage to property, environmental impacts, biodiversity concerns, or other project-related matters. Complaints may be submitted verbally, in writing, or anonymously through the Contractor/site GM focal person, complaint box at the project site, relevant MoERCC focal persons, or the S-FSRP Hotline 3060.

The designated GM focal person will receive and register general grievances, acknowledge receipt within 48 hours, assess and refer complaints to the responsible party, document actions taken, and communicate the outcome to the complainant. Resolution will normally be targeted within 7–14

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days. Unresolved grievances will be escalated to the PCU Safeguards Team and, where appropriate, relevant government authorities. Complainants retain the right to seek administrative or judicial redress if they are dissatisfied with the project-level resolution.

GBV/SEA/SH-related complaints will be handled separately through the dedicated confidential channel by the project GBV Officer using a survivor-centred approach. Such cases will not be recorded in the general GM register, will not require written evidence or mediation with alleged perpetrators, and will be handled confidentially with the survivor's consent and appropriate referral to qualified service providers, following the applicable referral pathways of the Puntland Ministry of Women Development and Family Affairs.

The PCU Safeguards Team will oversee GM implementation, review grievance records and resolution status, and ensure appropriate follow-up and reporting in accordance with the S-FSRP SEP. Information on the GM, including Hotline 3060, grievance procedures, available channels, and confidentiality provisions for GBV/SEA/SH cases, will be communicated to workers, MoERCC staff, visitors, and other relevant stakeholders through project induction, stakeholder engagement activities, and notices/posters displayed at the project site. A standard Complaint Form is included in the ESMP Annex

7. Compliance and Coordination

This chapter summarizes the institutional framework for ensuring compliance and coordination in the planning and implementation of the Construction of the Gene Bank Project. It describes the mandates, responsibilities, and reporting lines of all key institutions and actors involved in ESMP implementation during construction and operation of the Gene Bank.

7.1 Institutional Roles and Responsibilities

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

Table 4: Institutional Roles and Responsibilities for ESMP Compliance

Institution / Actor	Mandate / Role	Key Responsibilities for ESMP Compliance	Coordination / Reporting Line
MoERCC (Ministry of Environment, Range and Climate Change)	Lead technical owner for the Construction of the Gene Bank Project.	Provides the project site within the existing MoERCC compound; oversees planning, implementation, operation and maintenance of the Gene Bank; coordinates access to existing water and other Ministry	Coordinates with the PCU, Supervising Engineer, Contractor and relevant MoERCC technical departments; responsible for operational oversight

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Institution / Actor	Mandate / Role	Key Responsibilities for ESMP Compliance	Coordination / Reporting Line
		services; supports E&S compliance; oversees nursery management, plant propagation, herbarium management, demonstration planting, plant biosecurity, invasive species prevention and sustainable collection of native, endemic and threatened plant species; ensures long-term maintenance and sustainability of the Gene Bank.	following completion and handover.
SPCU / Project Coordination Unit MoAI (Safeguards Team)	ESF oversight for the subproject; World Bank safeguards compliance.	Ensures ESMP implementation; reviews and approves contractor C-ESMP and OHS plans; monitors compliance including labour, OHS, stakeholder engagement, and GM; consolidates E&S reports; oversees complaints logging; coordinates between ministries; supports reporting, incident management, and corrective action follow-up.	Reports to implementing agency / project management; coordinates with MoERCC, Municipality, and Supervising Engineer.
Supervising Engineer (SE)	Day-to-day construction supervision.	Confirms contractor compliance with ESMP/C-ESMP; verifies OHS, waste, traffic management, and community safety measures; documents non-compliances and instructs corrective actions; supervises construction of the Gene Bank nursery and herbarium facilities, associated site works, and installation of the pipeline connection from the existing MoERCC water supply; and verifies proper site reinstatement following completion of works.	Reports to SPCU and implementing agency; coordinates daily with Contractor and focal points.
Contractor	Executes civil works.	Prepares and implements C-ESMP, OHS plan, waste management, traffic/access controls, dust/noise control, worker Code of Conduct, SEA/SH prevention measures, and community safety actions; assigns dedicated EHS focal person and	Reports to Supervising Engineer; provides monthly E&S reports; notifies incidents immediately.

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Institution / Actor	Mandate / Role	Key Responsibilities for ESMP Compliance	Coordination / Reporting Line
		GBV/GM focal person; provides PPE; keeps records (trainings, incidents, inspections); reports incidents immediately.	

7.2 Coordination and Reporting Lines

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

- The PCU serves as the central project coordination and E&S oversight hub, linking MoERCC, the Supervising Engineer, the Contractor, and other relevant institutions, and ensuring compliance with S-FSRP and World Bank ESF requirements.
- MoERCC provides overall technical leadership for the Gene Bank, as the technical owner and host institution, and oversees the site, construction coordination, biodiversity-related activities, and subsequent operation and maintenance of the facility.
- The Supervising Engineer acts as the primary interface between the PCU, MoERCC, and the Contractor on a day-to-day basis and monitors implementation of the ESMP and Contractor's C-ESMP.
- The Contractor submits monthly E&S performance reports to the Supervising Engineer and promptly reports environmental, social, OHS, SEA/SH, security, or other significant incidents in accordance with established project incident-reporting procedures.

- Workers, MoERCC staff, visitors and other stakeholders may channel project-related concerns through the designated GM focal persons and available grievance channels, including the S-FSRP Hotline 3060, for formal registration, follow-up and resolution.

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8. Stakeholder Consultation

8.1 Introduction

Stakeholder consultation was conducted as part of the environmental and social screening and preparation of the ESMP for the Construction of the Gene Bank Project within the MoERCC compound in Garowe. The consultation was intended to provide stakeholders with information on the proposed project, obtain their views and concerns, and identify environmental and social issues that should be considered during project implementation.

The consultation primarily involved MoERCC staff and other users of the MoERCC compound, reflecting the institutional setting of the proposed Gene Bank. A total of 26 participants attended the consultation, comprising 20 males and 6 females.

Participants were informed about the purpose of the Gene Bank, proposed construction activities, nursery and propagation facility, demonstration planting, use of the existing MoERCC water supply,

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expected biodiversity benefits, potential construction impacts, and proposed environmental and social mitigation measures

8.2 Objectives of the Consultation Process

Stakeholder consultations were conducted to:

- Provide stakeholders with clear information on the proposed Gene Bank Project and its main components
- Explain the planned construction activities and the location of the project within the existing MoERCC compound
- Identify potential environmental and social concerns associated with construction and operation
- Obtain stakeholder views on site access, health and safety, dust, noise, waste management, water use and other project-related issues
- Discuss the biodiversity conservation objectives of the Gene Bank, including propagation of native, endemic and threatened plant species
- Promote inclusive participation of women and other relevant stakeholders
- Provide information on the project Grievance Mechanism, including the S-FSRP Hotline 3060;
- Incorporate stakeholder feedback into the ESMP mitigation and monitoring measures.

8.3 Issues Raised by the Community and Responses Provided

Table 5: Issues Raised by the Community and Responses Provided

Key Issues Raised by Stakeholders	**Stakeholder Views / Concerns**	**Response / Proposed Measures**	**Consultation Outcomes**
Construction within the MoERCC compound	Participants emphasized that construction activities should be properly organized so that normal Ministry operations are not unnecessarily disrupted.	Construction will be confined to the designated Gene Bank footprint, and activities will be coordinated with MoERCC management. Access to offices and other	Stakeholders generally supported the construction of the Gene Bank and recognized its importance for conserving and propagating native,

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Key Issues Raised by Stakeholders	Stakeholder Views / Concerns	Response / Proposed Measures	Consultation Outcomes
		Ministry facilities will be maintained throughout the works.	endemic and threatened plant species
Health and safety	Participants highlighted the importance of protecting workers, Ministry staff and other compound users from open excavations, construction materials and active work areas.	The Contractor will install barriers and warning signs, protect open excavations, restrict unauthorized access, provide appropriate PPE and implement the OHS and public safety measures contained in the ESMP and C-ESMP.	Participants emphasized that construction activities should be properly managed to minimize dust, noise, safety risks and disruption to MoERCC staff and other compound users.
Dust emissions	Temporary dust from excavation, construction materials and vehicle movements was identified as a potential nuisance to staff working within the compound.	Dust suppression measures will be applied where necessary, including water spraying, appropriate material handling, vehicle-speed control and good housekeeping.	Participants emphasized the importance of proper waste management and good housekeeping during construction to keep the MoERCC compound clean and safe.
Noise disturbance	Participants noted that construction noise could temporarily affect Ministry staff and normal office activities.	Noisy works will be undertaken during normal daytime construction hours, equipment will be properly maintained, and particularly noisy activities will be coordinated with MoERCC management.	Stakeholders welcomed the establishment of the Gene Bank and highlighted that the propagation and conservation of native and climate-adapted plant species will support future rangeland restoration and rehabilitation initiatives in Puntland

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Key Issues Raised by Stakeholders	Stakeholder Views / Concerns	Response / Proposed Measures	Consultation Outcomes
Grievance Mechanism	Stakeholders were informed of the need for an accessible channel to raise project-related complaints and concerns.	The project GM, including the S-FSRP Hotline 3060, will be available throughout project implementation. General complaints will follow the standard GM process, while SEA/SH cases will use the confidential survivor-centred pathway.	Stakeholders emphasized continued consultation, accessible grievance channels, and fair opportunities for local employment, including women and youth where feasible.

8.4 Overall Conclusion

Overall, stakeholders expressed strong support for the Construction of the Gene Bank Project and emphasized its importance for the conservation and propagation of native, endemic, threatened and climate-adapted plant species, supporting rangeland restoration and rehabilitation initiatives, and strengthening biodiversity conservation in Puntland**.** Stakeholder feedback has been incorporated into the environmental and social management measures, particularly in relation to construction safety, dust and noise control, waste management, water-use efficiency, local employment, sustainable plant collection, operation and maintenance, grievance handling, and continued consultation**.** Continued stakeholder engagement throughout project implementation and operation will support stakeholder participation, transparency, effective communication, and the long-term sustainability of the Gene Bank**.**

9. Conclusion

The Environmental and Social Management Plan (ESMP) for the Construction of the Gene Bank Project within the existing MoERCC compound in Garowe District, Nugaal Region provides a framework to ensure that the project is implemented in an environmentally sound, socially responsible, and sustainable manner. The assessment confirms that the potential environmental and social risks and impacts associated with small-scale construction works, nursery establishment, herbarium development, demonstration planting, water connection, and subsequent Gene Bank

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operation are site-specific, predictable, and manageable through the mitigation and monitoring measures established in this ESMP.

Effective implementation of the ESMP, including proper management of site preparation and limited excavation, construction activities, waste and pollution, occupational health and safety, safety of MoERCC staff and visitors, labour and SEA/SH risks, water-use efficiency, sustainable plant collection, pest and disease control, invasive species prevention, and continued stakeholder engagement, will minimize potential risks to workers, Ministry staff, visitors, and the surrounding environment while maximizing the environmental and institutional benefits of the project.

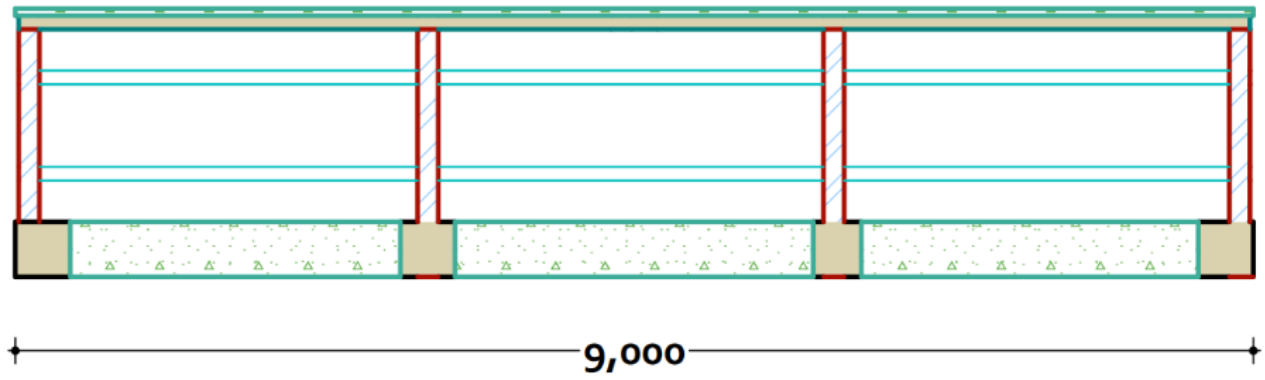
Stakeholder consultations demonstrated strong support from MoERCC staff and other users of the Ministry compound. Stakeholders emphasized the importance of biodiversity conservation, propagation of native, endemic, threatened and climate-adapted plant species, support for future rangeland restoration initiatives, proper construction-site management, efficient water use, and long-term operation and maintenance of the Gene Bank. The functional Grievance Mechanism (GM), including Hotline 3060 with separate channels for general grievances and confidential GBV/SEA/SH-related complaints, together with clearly defined institutional responsibilities and an ESMP implementation budget of USD 3,500, provides a sound basis for effective environmental and social management, supervision, and monitoring.

Overall, the ESMP confirms that the Construction of the Gene Bank Project can be implemented with manageable environmental and social risks, provided that the mitigation, monitoring, health and safety, biodiversity management, stakeholder engagement, and institutional measures are effectively implemented. Continued monitoring and reporting will support compliance with applicable national and Puntland State requirements, the S-FSRP environmental and social instruments, and World Bank Environmental and Social Standards (ESSs). The project is expected to strengthen biodiversity conservation, increase the availability of native and climate-adapted seedlings, support ecosystem and rangeland restoration, improve botanical documentation, promote environmental learning, and strengthen MoERCC institutional capacity for sustainable management of plant genetic resources.

10. Annexes

10.1. Design/Drawings

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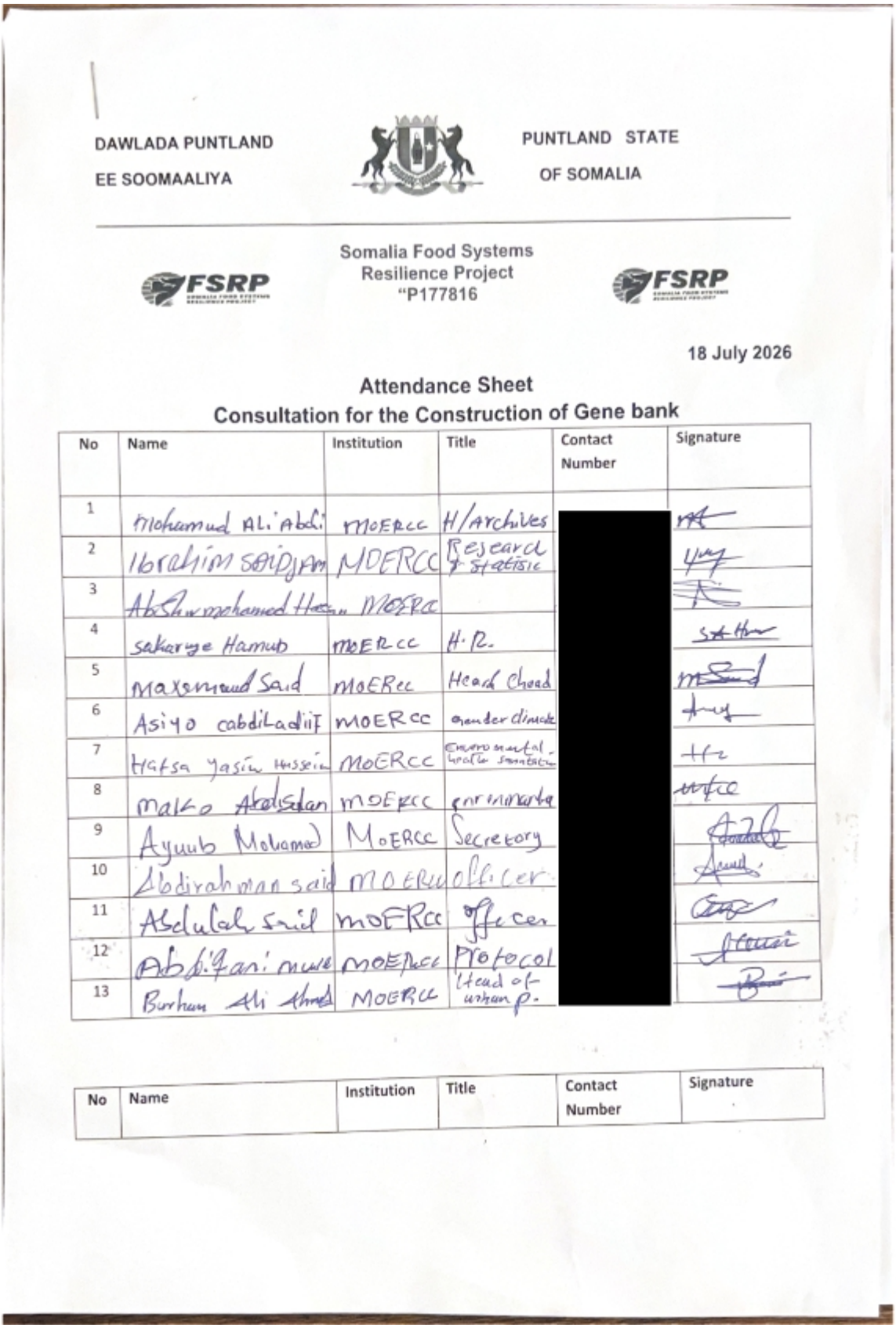


SECTION -- 02



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10.2. Stakeholder Consultation meetings' participant lists



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EE SOOMAALIYA

PUNTLAND STATE
OF SOMALIA

Somalia Food Systems
Resilience Project
"P177816

18 July 2026

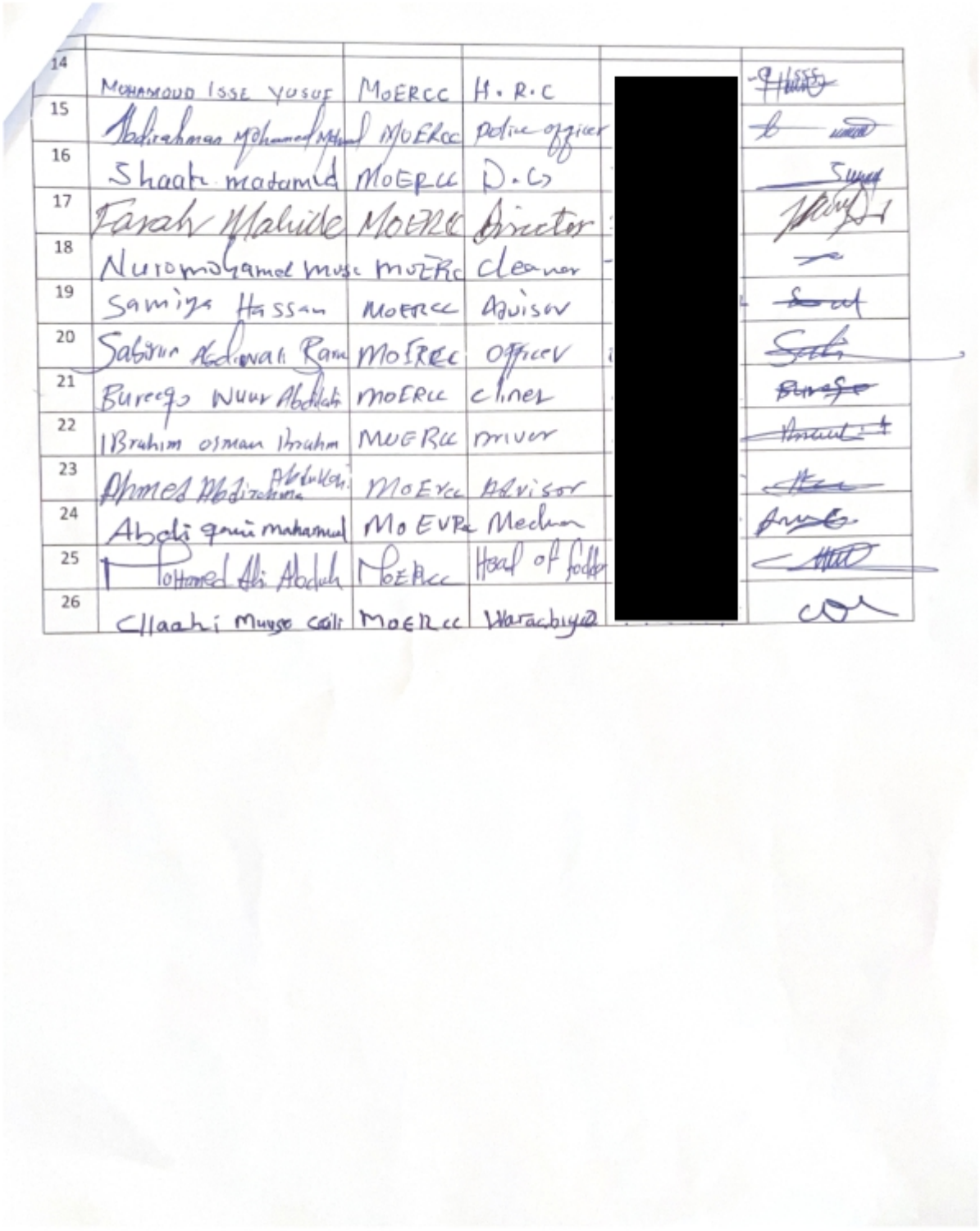
Attendance Sheet

Consultation for the Construction of Gene bank

No	Name	Institution	Title	Contact Number	Signature
1	Mohamud Ali Abdi	MOERCC	H/Archives	[redacted]	
2	Ibrahim Sorjam	MOERCC	Research & Statistic		
3	Abshir mohamed Hassan	MOERC			
4	Sakariye Hamud	MOERCC	H.R.		
5	Maxamuud Said	MOERCC	Head Chead		
6	Asiyo Cabdiladiif	MOERCC	Gender director		
7	Hafsa Yasin Hussein	MOERCC	Environmental Health Sanitation		
8	Malko Abdisalan	MOERCC	environmental		
9	Ayuub Mohamed	MOERCC	Secretory		
10	Abdirahman said	MOERC	officer		
11	Abdulah said	MOERCC	officer		
12	Abdifatah mure	MOERCC	Protocol		
13	Burhan Ali Ahmed	MOERCC	Head of urban p.		

No	Name	Institution	Title	Contact Number	Signature

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14					
15	Mohamoud Isse Yusuf	MoERCC	H.R.C	[redacted]	
16	Abdirahman Mohamed Mohamud	MOERCC	Police officer		
17	Shaafi mohamud	MoERCC	D.G		
18	Farah Khalif	MoERCC	Director		
19	Nuromohamed Musa	MoERCC	cleaner		
20	Samira Hassan	MoERCC	Advisor		
21	Sabiiur Abdinasir Rama	MoERCC	officer		
22	Bureeqa Nuur Abdikadir	MoERCC	cliner		
23	Ibrahim osman Ibrahim	MoERCC	Driver		
24	Ahmed Abdirahman Abdullahi	MoERCC	Advisor		
25	Abdi guure mahamud	MoERCC	Medical		
26	Mohamed Ali Abdulle	MoERCC	Head of Police		
	Khaahi Musse Ali	MoERCC	Warachiya		

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10.3 ES Screening Checklist

Social and Environmental Screening: FSRP	
Projects are screened for their inherent social and environmental risks regardless of planned mitigation and management measures. It is necessary to identify potential inherent risks in the event that mitigation measures are not implemented or fail. This means that risks should be identified as if no mitigation or management measures were to be put in place.	
SECTION A: General Information	
Date of screening	18th July 2026
Activity/Sub project title	Establishment of gene banks
Activity/Sub project component	FSRP Subcomponent/Activity 2.2.4: Establish and operationalize gene banks and indigenous tree nurseries to preserve local biodiversity and produce climate-adapted, high-quality tree and grass seedlings.
Implementing Partner	N/A
Proposed activity budget	N/A
Proposed activity duration	2 Months
ES Screening Team Leader and Contact Details	
ES Screening Team Members	FSRP E&S Team
Site/Activity location	MoERCC Compound, Garowe, Somalia
New/Rehabilitation project	Construction The land tenure is Government/Public
Project Description. Briefly describe project activities, activities that interact with the ES	The proposed Gene Bank is a new construction within the existing MoERCC compound in Garowe**.** The project will establish a 12 m × 8 m nursery and propagation facility with capacity for more than 5,000 seedlings at one time. The main project components/interventions include: • Nursery and Propagation Facility**:** Construction of a 12 m × 8 m nursery unit, including shade structure, seedling beds/benches and access paths, for propagation of native, endemic and threatened plant species. • Dedicated Herbarium Area**:** Establishment of an area for the collection, preservation, labelling, documentation and storage of plant specimens, initially covering at least 15 different types of trees/species. • Water Supply Connection**:** Installation of the required pipeline connection from the existing water supply within the MoERCC compound to serve the Gene Bank; no new borehole or shallow well is proposed. • Nursery and Herbarium Facilities**:** Provision of propagation trays, polybags, labels, watering equipment, soil-mixing and hardening arrangements, herbarium storage materials and specimen folders. • Plant Collection and Propagation**:** Collection of seeds, cuttings and specimens of priority endemic and threatened

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	species, followed by propagation of native trees, shrubs and dryland grasses.
Categorize Project Activities according to risk level: High, Substantial, Moderate, or Low	Moderate

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Potential Environmental/Social Risks Impacts of Activities					
Risk Category (Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	I don't know	If these risks ('yes') are present, refer to:	Comments
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is an Environmental and/or Social Assessment required where project is undertaken?	Yes			ESMP	
Is there a risk of diversion of project benefits?		No		Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM)	
Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity?		No		Security Management Plan (SMP)	
Is there a risk that project benefits may not reach truly vulnerable populations?		No		Stakeholder Engagement Plan (SEP)	
Is there a risk that the activity will cause population influx from neighboring areas?		No		Stakeholder Engagement Plan (SEP)	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?		No		Security Management Plan (SMP) Grievance Mechanisms (GM)	
ESS 2: Labour and Working Conditions					
Does the activity include any of the known labor rights / ESS 2 non-compliance risks in Somalia (child and forced labor)?	Yes			Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include a construction component?	Yes			Labor Management Procedures (LMP) C-ESMP Occupational Health and Safety Plan (OHS)	
Does the activity include labor-intensive manufacturing?		No		Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	

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Does the activity include primary agricultural activities?	Yes			Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Will the activity require a larger contractor workforce?		No		Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for Project Workers?		No		Security Management Plan (SMP)	The comment is noted. However, no specific security risks were identified during the site assessment. The proposed construction will take place within the existing MoERCC government compound in Garowe, which is an established and controlled government premises. Therefore, preparation of a separate site-specific Security Management Plan is not considered necessary. Standard site access control and security measures will be implemented by the contractor as part of the C-ESMP
Is there a risk of lacking OHS for workers at the construction site?	Yes			Occupational Health and Safety Plan (OHS) Pest Management Plan (PMP)	
Is there a risk of delayed payment of workers?		No		Labor Management Procedures (LMP)	In Somalia, both skilled and unskilled laborers are typically hired as casual workers and are paid on a daily basis. As a result, there is

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					generally no risk of delayed payments. Payment terms will be included in written employment agreements
Is there a risk that workers are underpaid?		No		Labor Management Procedures (LMP)	
Would the project potentially discriminate against women and girls based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?		No		Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM)	
Is there a risk that women will not be included in deployment in equal numbers?	Yes			Labor Management Procedures (LMP) GBV Action Plan	Since this is construction work, which is physically demanding, it is traditionally considered a male-dominated activity in Somalia. Culturally, women are not commonly involved in heavy labor but may participate in lighter tasks such as watering, preparing food, and other supportive roles.
ESS 3: Resource Efficiency and Pollution Prevention Management					
Will the activity result in the production of solid waste? (directly by the project or by workforce)	Yes			Waste Management Plan, based on WBG Environmental, Health, and Safety General Guidelines Pest Management Plan (PMP) C-ESMP	
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceutics, industrial chemicals, ozone depleting substances)	Yes				
Will the activity result in the generation of dust an noise?	Yes			C-ESMP	
Will the activity result in soil erosion?	Yes			C-ESMP	
Will the activity produce effluents (waste water)?	Yes			C-ESMP Waste Management Plan	
Will the activity result in increased levels of vibration from construction machinery?		No		C-ESMP	
Will the project produce air pollution? (e.g. significant greenhouse gas	Yes			C-ESMP	

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emissions, dust emissions and other sources)					
Will the activity result in irrigation water with high TDS with more than 1,500 ppm?	Yes			C-ESMP Waste Management Plan	
Can the project affect the surface or groundwater in quantity or quality? (e.g. discharges, leaking, leaching, boreholes, etc.)	Yes				
Will the project require use of chemicals? (e.g. fertilizers, pesticides, paints, etc.)		No			
Is there any risk of accidental spill or leakage of material?	Yes				
ESS 4: Community Health and Safety					
Is there a risk of community exposure to pesticides?	Yes			Pest Management Plan (PMP)	
Is there a risk of communal drinking water pollution through pesticides?		No		Pest Management Plan (PMP)	
Is there a risk of increased GBV/SEAH cases due to labor influx?	Yes			GBV/SEAH Action Plan Labor Management Procedures (LMP)	
Is there a risk of spread of communal diseases due to labor influx?		No		Labor Management Procedures (LMP) C-ESMP	
Is there a security risk to the community triggered by project activities?		No		Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?		No		Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM)	
Will the activity include payments or cash transfers?		No		Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM)	
Will the activity expose community members to physical hazards on the project site?	Yes			C-ESMP	
Will the activity pose traffic and road safety hazards?		No		C-ESMP	
Will the activity include debris removal that may pose a safety hazard for the community?	Yes			Waste Management Plan	
Is there a possibility that the activity contaminates open wells?		No		Waste Management Plan C-ESMP	

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Is there a possibility that the activity spreads pathogens and other pollutants (eg latrines)	Yes			Waste Management Plan C-ESMP	
Can the activity contribute to the spread of disease (eg health facilities)?	Yes			Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	The land is owned by Government
Will the displacement / resettlement affect IDPs?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?		No		Stakeholder Engagement Plan (SEP) Grievance Mechanisms (GM)	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	Ministry Compound
Will the activity lead to disputes over land ownership?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	The proposed construction will take place within the existing MoERCC government compound in Garowe, which is established public/government land. No private land acquisition or change in land ownership is required; therefore, no land ownership disputes are anticipated.
Will the activity lead to blocked access to people in the area?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	The proposed construction will take place within the existing MoERCC government compound in Garowe
Will the activity require acquisition of land or physical buildings or infrastructure?		No		Resettlement Policy Framework (RPF)	This is public land belongs the Ministry of Environment,

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				Resettlement Action Plan (RAP)	Range and Climate Change
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Are pesticides used in the activity likely to affect important natural resources or ecological functions?		No		Pest Management Plan (PMP)	
Will the activity impact sensitive areas?		No			
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?		No			
Is there a risk that the activity causes loss of precious ecological assets?		No			
Will the activity disturb any fauna and flora?		No		C-ESMP	The proposed construction is small-scale and will be undertaken within the existing MoERCC government compound in Garowe, which is already developed and used for institutional activities. The construction footprint does not contain significant natural vegetation or important fauna habitat. Therefore, the activity is not expected to cause significant disturbance to flora, fauna, or natural habitats
ESS 10: Stakeholder Engagement and Information Disclosure					
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?		No		Stakeholder Engagement Plan (SEP)	
Is there a historical exclusion of disabled persons in the area?		No		Stakeholder Engagement Plan (SEP)	
Is there a lack of social baseline data?		No		ESMF	

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

SUMMARY OF THE SCREENING PROCESS

E&S Screening	Results and Recommendation		
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Individual Risk/ Impact Rating	Mitigation At the end of the screen process, tabulate the mitigation measures in an ESMP Format (see below)
	ESS 1: Need for a structured E&S assessment and management process.	Moderate	Develop and implement a project-specific ESMP.
	ESS 2: Labor rights non-compliance (child/forced labor), poor working conditions, and OHS hazards.	Moderate	Implement Labor Management Procedures (LMP) and a robust Occupational Health and Safety (OHS) Plan.
	ESS 3: Pollution from solid/hazardous waste, dust, noise, and air emissions from construction activities.	Moderate	Implement a Waste Management Plan and site-specific controls within a Construction ESMP (C-ESMP).
	ESS 4: Spread of communicable diseases due to temporary labor influx.	Low	Implement worker health and hygiene protocols within the LMP and C-ESMP; manage waste and debris according to a Waste Management Plan.
	ESS5: No land acquisition, displacement, or restriction of access is	Low	No ESS5-related mitigation measures are required.

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	anticipated. The construction will be undertaken within the existing MoERCC government compound on public/government land.		
	ESS6: Very limited disturbance to vegetation may occur during construction within the existing developed MoERCC government compound. No significant impacts on fauna or natural habitats are anticipated.	Very Low	Confine works to the designated construction footprint and avoid unnecessary disturbance to existing vegetation.
	ESS8: risk of accidental/chance finds during construction	Very low	The project is within the existing developed MoERCC government compound, with no known cultural or archaeological resources. The risk is therefore very low. However, a Chance Finds Procedure will apply during excavation as a precautionary measure
	ESS 10: Need for active inclusion of women in decision-making.	Moderate	Implement targeted consultation and participation strategies as outlined in the Stakeholder Engagement Plan (SEP).
Is Additional Assessment Necessary? Evaluate the Risks/Impacts and reflect on options (see below)	Screening Result		Summary of Screening Result Justification
	2. Yes 1. Detailed ESMP. Done internally.		The Gene Bank Project is correctly categorized as Moderate Risk. The screening identified multiple, manageable E&S risks across ESS 1, 2, 3, 4,5,6, 8 and 10, typical of a small- to medium-scale Construction of a 12 m x 8 m nursery project. These impacts are site-specific, largely reversible, and can be effectively managed with standard mitigation measures. A detailed ESMP is therefore required. Since the project does not involve involuntary resettlement, significant biodiversity impacts, or cultural heritage risks, The SPCU can develop the ESMP internally, guided by the project's ESMF, incorporating well-

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		site-specific OHS measures, a groundwater monitoring protocol, a waste management plan for solar equipment, and a stakeholder engagement plan with gender-sensitive consultation.

10.4 Grievance Registration Form

COMPLAINANT DETAILS		
Name of the Project/Magaca mashruuca		
Sup-project/Shaqa hoosaadka laqabanayo		
Complainant's name (or name of a representative for complainant/s)/ Magaca qofka cabanaya		
Complainant's telephone number and e-mail address (if available)/ Telefoonka qofka Cabanaya		
I would prefer if the person contacting me is: /qofka soo gudbinya cabashada waxaan door bidayaa inuu nqodo:	Male/lab	Female/dheddig
GRIEVANCE DETAILS		
Date/Taariikhda		
Description of incident/Qeexid Nooca dhacdada		
Complainant's request/proposal to resolve grievance (Please explain what should be done to solve this		

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problem)/sharaxaad ku saabsan waxaad ka qabatay si aad uxalisid Cabashda			
Grievance type (environment, human rights, livelihood, health, legal, property, corruption)/Nooca Cabashada sida: Xuquuqda Qofka, noloshada, Caafimaadka, Sharciga iyo musuqmaasuqa			
Level of damage? /Heerka Waxyeelada	Low/hoose	Medium/dhexe	High/sare

10.5 Code of Conduct

All project workers shall comply with the following Code of Conduct:

- Treat women, children (persons under the age of 18), and men with respect regardless of ethnicity, language, religion, political or other opinion, national, social origin, citizenship status, property, disability, birth or other status.
- Do not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Do not participate in sexual activity with community members.
- Do not engage in sexual favors or other forms of humiliating, degrading or exploitative behavior.
- Do not engage in any activity that will constitute payment for sex with members of the communities surrounding the workplace.
- Report through the Worker GM suspected or actual gender-based violence against a person of any gender by a fellow worker or any breaches of this Code of Conduct.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass women, children or a vulnerable person through these mediums.
- Comply with all relevant local legislation.
- Engaging in any of the prohibited activities above can be cause for termination of employment, criminal liability, and/or other sanctions.

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10.6 Chance Find Procedures

Cultural heritage encompasses tangible and intangible heritage which may be recognized and valued at a local, regional, national or global level. *Tangible cultural heritage*, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water. *Intangible cultural heritage*, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artefacts and cultural spaces associated therewith— that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

In the event that during construction, sites, resources or artifacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents. These procedures take into account requirements related to Chance Finding under national legislation including [list relevant cultural heritage legislation in country].

- Stop the construction activities in the area of chance find temporarily.
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a guard shall be arranged until the responsible local authorities take over. These authorities are [list the responsible authorities under national legislation].
- Notify the relevant [implementing agency field staff] and the relevant [list the responsible local authorities under national legislation] immediately. [Implementing agency field staff] will inform the [implementing agency management].
- The relevant [list the responsible local authorities under national legislation] shall promptly carry out the necessities and inform the [national level cultural heritage or archeology ministry] immediately from the date on which the information is received.

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- The [national level cultural heritage or archeology ministry] would be in charge of evaluation /inspection of the significance or importance of the chance finds and advise on appropriate subsequent procedures.
- If the [national level cultural heritage or archeology ministry] determines that chance find is a non-cultural heritage chance find, the construction process can resume.
- If the [national level cultural heritage or archeology ministry] determines chance find is an isolated chance find, [national level cultural heritage or archeology ministry] would provide technical supports/advice on chance find treatment with related expenditure on the treatment provided by the entity report the chance find.

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10.7 Land Ownership



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DOWLADDA PUNTLAND EE SOMALIA

PUNTLAND STATE OF SOMALIA

PUNTLAND

Shahaadada Lahaanshaha Hantida Ma Guurtada Ah / Property Ownership Certificate

Taariikhda Diiwaangalinta:	11-03-2021
Ciwaanka Waddada:	504/1 6th Avenue, Wadajir, 70109 Garowe, Puntland, Somalia
Cabbirka Dhulka:	5750 Sq.Meters

Magaca Mulkiilaha

WASAARADA DEEGAANKA BEERAHA IYO ISBEDELKA CIMILADA

Tani waa warqada lahaanshaha Hantida Ma Guurtada ah oo asal ah. Lama ogola in la daabaco

This is the original Property ownership certificate on file. It is illegal to make copies of this certificate

DUQA DOWLADDA HOOSE EE DEGMADA GAROOWE

Maxamuud Cali Xasan
XOGHAYAHA DEGMADE

DAWLADA HOOSE EE. DEG. GAROWE
THE LOCAL GOVERNMENT OF GAROWE DISTRICT

Axmed Sicild Muuse
DUQA DEGMADA

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