DOWLAD GOBALEEDKA
GALMUDUG EE SOOMAALIYA
WASAARADDA BEERAHA IYO
WARAABKA



GALMUDUG STATE OF
SOMALIA

MINISTRY OF AGRICULTURE
& IRRIGATION

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

REHABILITATION OF PRIMARY AGRICULTURAL FEEDER ROADS

In

BAXDO, GALKAYO & DUSAMAREB DISTRICTS

For

The Ministry of AGRICULTURE AND IRRIGATION (MoAI)

SUBMITTED TO

FSRP NPCU E&S TEAM

Dusamareb – Galmudug, Somalia

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List of Abbreviations and Acronyms

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

1. EXECUTIVE SUMMARY

The World Banks' funded Somalia Food systems Resilience Project (S-FSRP) under component 1; Getting to markets supports the rehabilitation of three primary agricultural feeder roads in Baxdo, Galkayo and Dusamareb districts. this intervention aims to improve access of farmers to nearby markets, prevents post-harvest losses, reduces transportation costs and promotes production of farmer producer organizations. The rehabilitation also facilitates overall access of all users including; pastoral and agropastoral families and other residents that connected the main markets of the nearby towns. This subproject however, motivates increased farmers production and boosts their economic and livelihoods status whilst removes access constrains.

Key activities involved in the subproject implementation include; minimal bush Clearing and vegetation removal of the roadsides, graveling and re-graveling, shaping and levelling, pothole filling and Spot Repairs and mechanical Compaction Works of proposed primary feeder roads across three districts.

The subproject sites and their respective coordinates

- **Baxdo:** (5.799885, 47.205111)
- **Galkayo:** (6.67337, 46.68393) and
- **Dusamareb**: (5.558204, 46.367283)

Key environmental risks include dust, noise, soil erosion, temporary vegetation disturbance, construction waste, fuel and oil spills, drainage disruption, and occupational health and safety hazards. Mitigation measures include water sprinkling, proper waste management, erosion control, careful handling of fuels and lubricants, restoration of disturbed areas, traffic management, and provision of appropriate PPE and worker training.

Social risks include temporary disruption of access to farms and markets, traffic safety concerns, labour-related issues, occupational accidents, and potential exclusion of vulnerable groups. These will be addressed through stakeholder engagement, controlled and phased rehabilitation, community awareness, fair labour practices, accessible grievance mechanisms, and inclusive participation of women, youth, IDPs (where present), persons with disabilities, and other vulnerable groups.

GBV/SEA/SH risks are considered moderate and will be mitigated through enforcement of Codes of Conduct, worker awareness training, confidential grievance mechanisms, survivor-centred referral pathways, contractor supervision, and community sensitization.

Following completion of the rehabilitation works, the sustainability of the feeder roads will be supported through joint responsibility of the State Ministry of Agriculture and Irrigation, district authorities, and local communities, with continued community ownership and routine maintenance to ensure long-term functionality and improved access to agricultural production areas and markets.

Environmental, social, and gender-related risks and impacts associated with the rehabilitation works are site-specific, temporary, and manageable. The subproject will be implemented in full compliance with the World Bank-approved Environmental and Social Management Framework (ESMF) and the applicable Environmental and Social Standards (ESSs). Relevant national and state-level environmental and social laws and regulations will also be observed to ensure that all project activities comply with the applicable legal and regulatory requirements. Regular monitoring and supervision of the proposed mitigation measures will be undertaken by the Environmental and Social (E&S) team to ensure the subproject is implemented in an environmentally sound, socially responsible, and inclusive manner.

Once the subprojects is completed and the immediate and sustainable benefits for the farmer producers and other community segments include but not limited to the following;

- Improved access to local markets
- Prevents post-harvest losses
- Reduces transportation costs
- Promotes production of famers producer organizations
- And creates temporary employment opportunities.

2. INTRODUCTION

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

Agricultural feeder roads are a vital component of the rural transport infrastructure, linking smallholder farmers to input suppliers, markets, processing facilities and social services. In most of the districts in Galmudug State, such as Guriel, Dusamareb, Abudwaq, Adado, Xeraale, Galkacyo and Hobyo, decades of underinvestment, recurrent droughts, floods, and insecurity have severely affected road networks. Many rural access roads have deteriorated to impassable levels, especially during the rainy seasons, isolating farming and pastoral communities.

Due to poor road conditions, farmers experience significant post-harvest losses and higher transportation costs. In some cases, transporters double or triple freight charges to reach remote areas, and perishable goods such as fruits, vegetables, and dairy products often spoil before reaching markets. Women and youth traders who are the key actors in local agricultural markets are disproportionately affected due to limited mobility and access to reliable transport. The lack of adequate road infrastructure also limits access to agricultural inputs (such as seeds, fertilizers, and tools) and extension services, thereby constraining productivity and income generation.

However, improving feeder roads will therefore directly enhance food security, reduce transport costs, increase market access and promote inclusive growth in rural Galmudug. Rapid Needs Assessment conducted presents critical data and technical foundations for targeted rehabilitation and investment planning. This further informed broader resilience-building and agricultural value chain initiatives being implemented in the region by development partners and government institutions.

Based on the critical gaps identified in the assessment phase, Food Systems Resilience Project (FSRP) supports the rehabilitation of three critical primary feeder roads in Baxdo, Dusamareb and Galkayo. These roads directly connect farmers with main markets in the respective towns. The rehabilitation works will be led by the ministry of agriculture and irrigation (MoAI) of the state in close collaboration with the state project coordination unit (SPCU). Close coordination with respective district authorities ensures smooth implementation of the subproject.

The rehabilitation of the primary feeder roads will be implemented in accordance with FSRP environmental and social management plan (ESMF) and relevant standards for the bank other guidelines such as Good International Industry Practices (GIIPs), Occupation Health and Safety (OHS) and community health and safety to ensure full compliance. National laws and state regulations will also be considered and referenced where applicable to ensure relevance to the respective context. With these efforts, project will be implemented in an environmentally friendly, socially responsible putting the benefits of the target communities at the centre of this strategic intervention.

This Environmental and Social Management Plan (ESMP) identifies the environmental and social risks associated with the subproject, assesses their nature, magnitude, and potential impacts, and outlines appropriate mitigation measures to manage these risks. It also clarifies institutional roles and responsibilities, and establishes monitoring and capacity-building arrangements to ensure the effective and smooth implementation of the subproject in line with applicable environmental and social safeguards.

3. PURPOSE.

The purpose of this ESMP is to ensure that the rehabilitation of these primary feeder roads is aligned and implemented in an environmentally sound, socially responsible, and legally compliant manner with all relevant guidelines and standards are adhered.

Specifically, the ESMP aims to:

- Identify potential site-specific environmental and social risks and their impacts throughout the subproject cycles. According to the screening assessments risks include dust, soil disturbances wastes, traffic congestion (rare occasions) and removal of vegetations. All these risks are manageable through mitigation strategies.
- Outline site-specific and actionable mitigation measures to ensure full compliance of rehabilitation works with project approved ESM and other relevant standards.
- Institutional roles and responsibilities: this aims to define roles and responsibilities for any relevant stakeholder including the ministry, SPCU team, distracts authorities and farmers.
- Outline monitoring plans to ensure contractors implement mitigation measures set out in this plan.
- Set out capacity-building plans for all relevant stakeholders including the ministry, the contractors and the workers.

4. OBJECTIVES AND SCOPE OF THE ESMP

This Environmental and Social Management Plan (ESMP) provides a structured framework to guide the rehabilitation of the primary feeder roads in compliance with the approved Environmental and Social Framework (ESF). It outlines the measures required to identify, mitigate, monitor, and manage environmental and social risks associated with the subproject, ensuring that implementation is carried out safely, responsibly, and in a manner that benefits the target communities

General Objective

- To improve rural accessibility and strengthen agricultural value chains through the rehabilitation of feeder roads in selected districts of Galmudug State.

Specific Objectives

- To rehabilitate key feeder road segments in three districts that will improve road conditions, ensure year-round accessibility, and strengthen connectivity between production areas and major towns.
- To improve access to markets for farmers and cooperatives enabling farmers and cooperatives to transport goods more efficiently, increasing market participation and income opportunities.
- To reduce transportation costs and post-harvest losses. Better road infrastructure will minimize travel time, vehicle maintenance costs, and spoilage of agricultural produce during transportation.
- To enhance mobility and access to essential services. Communities will have improved access to healthcare facilities, schools, water points, and other social services, particularly during rainy seasons.
- To support economic recovery and resilience of rural communities. The project will stimulate local economic activities, create temporary employment opportunities, and strengthen community resilience against economic and climate-related shocks.

5. METHODOLOGY

Well-structed process was employed in the development of this ESMP. The process was consistent with already approved project Environmental and Social Management Frameworks. And other bank guidelines including Environmental and Social framework and National regulations such as Environmental protection and management act (April 2024), Somalia national climate change policy (updated February 2023) and Environmental and social impact assessment and audit regulations (ESIA 2024)

The methodology used in the development of this ESMP include:

5.1. Desk Review

A thorough review of some relevant documents was conducted, including; land ownership and municipal approvals and clearance reports from the public consultation. National Environmental Impact Assessment (EIA – 2024) and project design layouts and technical specifications reviewed. Also, S-FSRP ESMF and screening templates.

5.2. Site assessment and observations

Environmental and social safeguarding team from state project Implementation Unite (PIU) in collaboration with the Ministry of Agriculture and Irrigation (MoAI) and district authority visited the site to:

- Verify the land ownership and boundaries.
- Conduct and document baseline environmental and social conditions
- Identify any potential environmental and social risks or sensitivities.
- Conduct photographic documentation and GPS mapping

5.3. Community Consultations:

Stakeholder mapping was conducted to identify people and groups to be consulted. When mapping exercise was completed. The mapping concludes famers, ministry reps, side residents (where applicable) rural agropastoral families and districts reps being the primary people to be consulted.

Consultations were held with the district reps, MoAI, representatives, farmers and community representatives, including women farmers and traders. Stakeholders expressed strong support for the project and emphasized the importance of local employment opportunities, fairness, and gender inclusion.

5.4. Data Collection

A structured Environmental and Social Data Collection Checklist was used to document key physical, ecological, and social characteristics of the project site.

5.5. Risk Screening and Analysis

the Environmental and social safeguards team utilized the S-FSRP E&S screening tool to categorize potential risks. According to the assessments findings this subproject is classified as Moderate Risk (Category B) because the impacts of the identified risks are site-specific, manageable and with reversible impacts.

5.6. Reporting and Validation:

Findings were validated through coordination meetings with MoAI and the Municipality together with community, ensuring alignment between technical design, safeguards compliance, and community priorities.

6. SUBPROJECT DESCRIPTION

Agricultural feeder roads are a vital component of the rural transport infrastructure, linking smallholder farmers to input suppliers, markets, processing facilities and social services. The target districts of Dusamareb, Baxdo and Galkayo faced decades of underinvestment, recurrent droughts, floods, and insecurity have severely affected road networks. Many rural access roads including Dusamareb, Baxdo and Galkayo have deteriorated to impassable levels, especially during the rainy seasons, isolating farming and pastoral communities.

6.1. Locations description

6.1.1. Dusamareb

This primary feeder road connects farms, rural pastoral and agropastoral communities into Dusamareb district. The planned activity is the rehabilitation of 1 km road. The roadwork will involve minimal bush clearing, rock scaling, pit-filling, gravel spreading, compaction and levelling through the rehabilitation. During screening assessment, no plantations with archaeological importance was observed in the worksites. The land planned to rehabilitate is public owned the local authority. The official ownership and donation certificate have been received, reviewed and verified. It is attached in annex section. The global positioning system (GPS) coordinates of the worksite is *5.558204, 46.367283*. community engagement and consultation over clearance of the land ownership was conducted where all participants have unanimously confirmed the government owns and manages the land.

Based on the screening assessment conducted in Dusamareb, district, the proposed rehabilitation of the primary feeder road is environmentally and socially feasible. The anticipated impacts are moderate, localized, temporary and manageable through implementation of site-specific mitigation measures. Therefore, this ESMP prepared in line with the FSRP Environmental and Social Management Framework (ESMF) and World Bank Environmental and Social Standards (ESSs) and national and state governments policies and regulation relevant and applicable to this subproject. Below is the site map presenting plotted road areas proposed to rehabilitate.



A 1km primary feeder road that connects Dusamareb, Farmers and rural pastoral and agropastoral community. The map presents from the start to the end of the road planned to rehabilitate.

6.1.2. **Baxdo**

The proposed feeder road for rehabilitation connects famers, transporters, pastoral and agropastoral communities in the area to Baxdo and Adado respectively. It is a very strategic road in for resident pastoral and agropastoral communities. The distance of area proposed to be rehabilitated is 1km starting the entry point of Baxdo from Adado. The roadwork will involve minimal bush clearing, rock scaling, pit-filling, gravel spreading, compaction and levelling through the rehabilitation. During screening assessment, no plantations with archaeological importance was observed in the worksites. The land planned to rehabilitate is public owned the local authority. The official ownership and donation certificate have been received, reviewed and verified. It is attached in annex section. The global positioning system (GPS) coordinates of the worksite is *5.799885, 47.205111*. community engagement and consultation over clearance of the land ownership was conducted where all participants have unanimously confirmed the government owns and manages the land.

Based on the screening assessment conducted in Baxdo, district, the proposed rehabilitation of the primary feeder road is environmentally friendly and socially responsible. The anticipated impacts are moderate, localized, temporary and manageable through implementation of site-specific mitigation measures. Therefore, this ESMP prepared in line with the FSRP Environmental and Social Management Framework (ESMF) and World Bank Environmental and Social Standards (ESSs) and national and state

governments policies and regulation relevant and applicable to this subproject. Below is the site map presenting plotted Dusamareb road areas proposed to rehabilitate.



Figure 2: A 1km primary feeder road that connects Baxdo- Adado, Farmers and rural pastoral and agropastoral community. The map presents from the start to the end of the road planned to rehabilitate.

6.1.3. **Galkayo**:

This primary feeder road connects farms, rural pastoral and agropastoral communities into Galkayo district. The planned activity is the rehabilitation of 1 km road. The roadwork will involve minimal bush clearing, rock scaling, pit-filling, gravel spreading, compaction and levelling through the rehabilitation. During screening assessment, no plantations with archaeological importance was observed in the worksites. The land planned to rehabilitate is public donated by the local authority. The official ownership and donation certificate have been received, reviewed and verified. It is attached in annex section. The global positioning system (GPS) coordinates of the worksite is *6.67337, 46.68393*. community engagement and consultation over clearance of the land ownership was conducted where all participants have unanimously confirmed the government owns and manages the land.

Based on the screening assessment conducted in Galkayo, district, the proposed rehabilitation of the primary feeder road is environmentally and socially feasible. The anticipated impacts are moderate, localized, temporary and manageable through implementation of site-specific mitigation measures. Therefore, this ESMP prepared in line with the FSRP Environmental and Social Management Framework (ESMF) and World Bank Environmental and Social Standards (ESSs) and national and state governments

policies and regulation relevant and applicable to this subproject. Below is the site map presenting plotted road areas proposed to rehabilitate.



Maps showing primary feeder road connecting Galkayo to the farmers and rural pastoralist. rehabilitation works will about 1km as shown in the map.

6.2. **Key Subproject components**

- **Bush Clearing and Vegetation Removal**: Minimal clearing of roadside bushes and overgrown vegetation to widen visibility and improve access.
- **Graveling and Re-graveling:** Placement of gravel materials on deteriorated road sections to improve road surface condition and accessibility.
- **Shaping and Levelling**: Earthworks involving grading, reshaping, and levelling of the road alignment to improve drainage and traffic movement.
- **Pothole Filling and Spot Repairs**: Filling eroded or damaged road sections and repairing weak spots along the feeder road.
- **Compaction Works**: Mechanical compaction of the road surface to strengthen durability and reduce erosion and dust generation.

6.3. **Workforce Composition**

The rehabilitation of agricultural feeder roads works will engage in an estimated **45 workers**. Each worksite will engage for about 15 workers. The workforce composition is as follows:

- **Skilled workers:** 6
- **Unskilled workers:** 36
- **Engineers and site management team:** 3

6.4. **Workers' origin**:

Almost of the workers are from the local. Only the engineer may be sourced outside where necessary. The project will prioritize recruitment from the local community to minimize labour influx and associated social risks, including OHS and SEA/SH risks, in accordance with World Bank ESS2 and ESS10.

6.5. **Site accessibility**

Unpaved roads are well established, with no traffic congestion or movement restrictions affecting entry to the site. Contractors and other relevant stakeholders can access the site easily without limitations related to timing or transportation. The nature being narrow and rough of the roads will require controlled driving with vehicles/tracks that carry materials for roads rehabilitations to worksite.

6.6. **Subproject alternatives**

In line with the World Bank Environmental and Social Framework (ESF), different project alternatives were carefully assessed before selecting the final approach for the rehabilitation of primary agricultural feeder roads in Baxdo, Galkayo, and Dusamareb. The assessment process considered both technical and socio-economic factors to ensure that the selected interventions respond to the practical needs of farmers, pastoral and agro-pastoral communities that depend heavily on farming, livestock production and trade for their livelihoods. Key considerations included accessibility constraints, availability of farmers/farming, environmental and social safety, cost-effectiveness, population density, strategic road locations, and the views and acceptance of local communities and authorities.

The "no project" alternative was also considered during the assessment process. Although this option would avoid temporary environmental and social risks associated with rehabilitation primary feeder roads, it would leave the existing feeder roads in their current poor condition, with inadequate infrastructure, and difficulties in accessing market for their produce. Given the central role of these roads in supporting household incomes, trade, food security, and local economic growth, the no-project option would likely contribute to continued economic losses, reduced road access, poor hygiene conditions, and increased vulnerability among farmers and livestock-dependent communities. Therefore, this option was not considered viable.

Alternative intervention options were further discussed with local communities, district authorities, ministry of works, and relevant government stakeholders. Rather than establishing entirely new roads, the preferred option focused on rehabilitating and upgrading the primary agricultural feeder roads due to their strategic locations, established accessibility routes, existing land ownership arrangements, and strong community preference. The proposed interventions aim to improve and complete critical roads infrastructure, including graveling, levelling, minor push clearing, and internal access routes.

Therefore, the selected approach was considered the most practical, environmentally and socially acceptable, and economically feasible option, as it builds on already existing roads conditions while minimizing land acquisition risks, community ownership, and environmental disturbance. Moreover, the rehabilitation of the existing feeder roads will improve market operations, enhance farming and livestock

trade, strengthen resilience of pastoral communities, and support sustainable local economic development across the target districts.

7. ENVIRONMENTAL AND SOCIAL BASELINE CONDITIONS

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

7.1. Spatial differentiations of the three sites

Dusamreb is relatively semi-urban with poor road connectivity and scattered settlements. The spatial layout exposes the site to accessibility challenges, particularly during rainy seasons when roads become impassable. The area is predominantly grazing and farming land. Therefore, such intervention is timely and contribute accessibility, reduce lead times, and prevents post-harvest losses and transportations costs of farmers and agro-pastoralists to and from the town. No waste or environmental contaminations is expected during the rehabilitation of this primary feeder roads.

Baxdo is located in a typical arid pastoral landscape characterized by dispersed settlements and reliance on berkads and shallow water catchments. Spatial risks include water scarcity, especially during prolonged dry seasons, and limited road access, which can constrain access to nearby markets such as Adado and Baxdo, thus, further, leads post-harvest loses for farmers produce and transpiration cost for users. the rehabilitation will never expose contamination and wastes to both users and the environment. A controlled works will be implemented in the worksite.

Galkayo presents a mix of pastoral and semi-settled characteristics, with some relatively better access to small-scale services. However, spatial risks include pressure on limited natural resources, particularly water and grazing land, and informal waste disposal practices. The presence of small solar systems indicates some adaptive capacity, but infrastructure gaps remain significant. However, the proposed subproject will not expose any of these issues rather, will be implemented in an environmentally sound and socially responsible manner.

7.2. Meteorology and climate

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

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

In **Baxdo** experiences intensified heat stress and dust accumulation due to dense settlement patterns and limited vegetation cover.

In **Galkayo** is relatively advantaged during rainy seasons due to temporary surface water availability but is also prone to flooding, soil saturation, and contamination risks associated with stagnant water.

7.2.1. Soil

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

In **Dusamareb** soils are relatively stable but are susceptible to wind erosion due to sparse vegetation cover.

In Baxdo, soils show signs of localized contamination due to prolonged human and livestock activity, combined with poor waste disposal practices.

In **Galkayo**, soils tend to retain more moisture during the rainy seasons, which increases the risk of waterlogging and potential pathogen accumulation. While no major industrial contamination was identified, the absence of formal waste management systems across all sites presents a growing environmental concern.

7.2.2. Air Quality and Noise Levels

Air quality and noise levels in the project areas are generally within acceptable limits, reflecting the absence of industrial activities. However, there are site-specific variations.

Dusamareb is affected by dust generated from open land and livestock movement.

Baxdo experiences moderate dust levels due to traffic, human activity, and livestock concentration.

Galkayo experiences seasonal fluctuations in air quality linked to both dust and humidity.

Noise levels are low across all sites, with only minor disturbances associated with routine community and livestock activities. rehabilitation activities are expected to temporarily increase dust and noise levels, particularly in more populated areas such as such Dusamareb and Galkayo.

7.3. Biological Environment

7.3.1. Fauna

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

7.3.2. Flora

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

7.4. Socioeconomic Environment

7.4.1. Demographic Characteristics

Dusamareb, Galkayo and Baxdo are urban areas whose socio-economic structure is closely linked to the surrounding agropastoral and pastoralist communities. The three districts are administratively independent and generally connected to each other and to other cities in the state. Dusamareb is the city of Galmudug state where major government offices such the state house, house of the parliament and

ministries locate. The combined population of the villages and their adjacent rural catchment areas is estimated at approximately 406,000 people (UN, 2025).

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

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

7.4.2. Land Tenure and Ownership

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

7.4.3. Livelihoods and Employment

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

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

Baxdo is predominantly pastoral and agro-pastoral, with livelihoods heavily dependent on livestock rearing and seasonal livestock trade. Most households rely on camels, goats, and sheep as their primary source of income and food security. Employment opportunities outside livestock production are limited, and small businesses mainly consist of tea shops, kiosks, livestock-related services, and petty trading activities. Due to its relatively remote setting and limited infrastructure, Baxdo experiences constrained market access and reduced economic diversification. Households are therefore highly vulnerable to

climate-induced droughts, water shortages, pasture depletion, and livestock diseases, all of which significantly affect income generation and household resilience. Informal social support systems and remittances serve as important coping mechanisms during drought periods.

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

7.4.4. Administration and Governance:

Dusamareb serves as the administrative capital of Galmudug State, with district authorities overseeing governance, security coordination, and public service delivery. Traditional elders and religious leaders remain influential in community decision-making and conflict resolution. They play an important role in land management and mobilizing local participation in development activities. Coordination between government authorities, elders, and project teams is essential for effective implementation and community acceptance.

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

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

7.4.5. Social Institutions

The target districts have well-established community structures, including women's groups, youth associations, and traditional leadership systems composed of elders and religious leaders. These institutions play a vital role in local development, community mobilization, and awareness-raising initiatives. Traditional leaders, in particular, remain highly influential in decision-making processes across all project sites. Their involvement is essential for fostering community acceptance, ensuring inclusive participation, and supporting the long-term accessibility of the farmers and agro-pastoralists to the markets thus, increasing production. Women, who constitute a significant proportion of the population, are central to community life and contribute across multiple areas, including small-scale trade, healthcare (such as midwifery), administrative roles, and household management.

7.4.6. Gender and Vulnerable Groups

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

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

7.4.7. Access to Water, Energy, and Waste Management:

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

Baxdo has limited and unreliable access to water, with pastoral communities depending heavily on berkads, shallow wells, and seasonal rainwater sources. Electricity coverage is minimal and mainly supplied through small private generators and solar systems serving selected households and businesses. Waste management practices are largely informal, with no established municipal collection or disposal systems in place. However, the project will not generate significant wastes that adversely affects both the human health and the environment.

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

7.4.8. Cultural Heritage:

During the assessment and the field visit no known cultural, historical, or archaeological heritage and other valuable arts was observed within the project area. Nevertheless, in accordance with ESS1, a Chance Finds Procedure will be included in the Contractor's ESMP to manage any unexpected discoveries during excavation works.

7.4.9. Community Perceptions

During consultations, the community presented their appreciation to the proposed subproject pledging their commitment to support. They underline the importance of these roads for their daily access to services. Community members also requested that local labor be prioritized, rehabilitation waste to be properly managed, and awareness be conducted on safety and sanitation.

7.4.10. **Security Context:**

Dusamareb is relatively stable compared to other districts in central Somalia due to the presence of Galmudug State institutions and security forces. However, occasional security threats, clan-related tensions, and movement restrictions may still occur in surrounding rural areas. Coordination with local authorities and community leaders remains important during project implementation.

Baxdo experiences periodic security challenges linked to clan disputes, limited security infrastructure, and instability in nearby rural areas. Community-based security arrangements and traditional elders play an important role in maintaining local stability. Careful coordination and conflict-sensitive engagement are essential during field activities.

Galkayo has a relatively active security presence due to its strategic commercial importance and urban population. While the district is generally accessible, security incidents related to criminal activities, clan tensions, and regional instability may occasionally occur. Close coordination with local authorities and adherence to security protocols are necessary for safe project operations.

7.5. **Environmental Sensitivities**

During the baseline assessment, field visits and consultation meetings with community, no cultural, ecological and other valuable items of human or environmental values were identified in or around the site. To ensure the maximum environmental compliance, chance-find procedures (CFPs) will be included the in the development of the ESMP.

The main environmental sensitivities identified are:

- Deteriorated roads condition caused accidents
- Dusts resulted from winds and the dry seasons.
- Limited vegetation cover leading to potential soil erosion.

These sensitivities are moderate and can be effectively mitigated through the proposed environmental and social management measures outlined in subsequent sections.

8. LEGAL, REGULATORY AND INSTITUTIONAL FRAMEWORKS

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

This ESMP will also ensure alignment and full compliance with the World Bank's Environmental and Social Framework (ESF) and its Environmental and Social Standards (ESS), as well as the associated Environmental, Health, and Safety Guidelines (EHSGs) and Good International Industry Practice (GIIP), to which the borrower is obliged, thereby promoting sustainable, safe, and socially responsible implementation of the rehabilitation works.

8.1. National Framework

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

8.1.1. The provisional Constitution of Somalia

According to the Constitution of the Federal Government of Somalia (FGS), several constitutional provisions are directly relevant to the rehabilitation primary feeder roads.

Article 1 affirms that human dignity is the foundation of all human rights and must be protected at all times; accordingly, the rehabilitation of the roads will be implemented in a manner that respects and upholds human dignity.

Article 24 guarantees fair labour relations, gender equality, and protection from discrimination and abuse. This will guide the rehabilitation works to ensure equal employment opportunities, gender inclusion, and a safe working environment free from violence and exploitation.

Article 32 establishes the right of access to information. The rehabilitation works will regularly engage roadside communities and workers to disclose all relevant subproject information in a timely and transparent manner.

Article 45 underscores the importance of environmental protection and shared responsibility between the government and the public, and in alignment with this provision, the Environmental and Social Management Plan (ESMP) for the rehabilitation of feeder roads incorporates measures to prevent environmental harm and promote conservation throughout the project's implementation.

8.1.2. Somalia Environmental Protection and Management Act (April 2024)

This Act, ratified by the Federal Parliament and signed into law in April 2024, establishes Somalia's core legal framework for environmental protection and sustainable development. It guarantees every person's right to a clean, safe, and healthy environment and embeds principles like precaution, polluter-pays, and sustainability. The rehabilitation works will not involve potential risks as identified in the screening report (already cleared). It will be implemented in an environmentally friendly and socially responsible manner. To do so, training and capacity-building session will be provided to both contractors and workers.

8.1.3. Somalia National Climate Change Policy (updated February 2023)

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

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

These Regulations operationalise the Environmental Protection and Management Act by detailing procedures for Environmental and Social Impact Assessments and audits. They require that all projects likely to have environmental or social impacts conduct an ESIA prior to implementation, including public participation and mitigation planning, and outline standards for ongoing monitoring and compliance. For this subproject risk is moderate to low as per screening assessment conducted, risks are localized, reversible and manageable therefore, no ESIA is required for this subproject.

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

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

8.1.6. Somalia Labor Code (1972)

This subproject will be implemented in accordance with the Somalia Labor Code, which establishes the legal framework governing labour relations in rehabilitation and construction activities, including working hours, minimum wages, occupational health and safety, and non-discrimination. During the implementation period, working hours will be limited 8hrs, workers age will be verified prior, fair and time-bound wages will be provided to the workers. All contractors, subcontractors, and service providers involved in the road's rehabilitation must comply with the Somalia Labor Code and the World Bank's Environmental and Social Standard ESS2 (Labor and Working Conditions).

8.2. Institutional frameworks

This section presents all relevant institutions and stakeholders involved in the rehabilitation of agricultural feeder roads in Dusamareb, Baxdo and Galkayo. It defines roles and responsibilities each stakeholder will play to ensuring effective and coordinated implementation of the proposed subproject. It will also facilitate collaboration to avoiding confusion among the stakeholders.

8.2.1. Ministry of agriculture and Irrigation (MoAI):

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

8.2.2. Project Coordination Unit (PCU)

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

8.2.3. Contractor

Implements the actual physical rehabilitation works in the proposed sites. The constructor is also responsible to implement mitigation measures and strategies set out in the ESMP such as workers safety and occupational health, waste control and management. The contractors will report environmental and social performance to the project team on monthly bases.

8.2.4. District authorities

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

8.2.5. Community Structures/committees

The local community structures participate consultation meetings, mobilization sessions. They also ensure inclusivity, involvements and participations. Roadside residents (where possible) will sign a no objection letter certifying their acceptance.

8.3. World Bank Environmental and Social Framework (ESF)

The rehabilitation of the feeder roads is guided by several World Bank guidelines and frameworks to ensure environmental sustainability, social inclusion, and safety. These include the World Bank's

8.3.1. Environmental, Health, and Safety Guidelines (EHSGs)

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

8.3.2. Good International Industry Practice (GIIP)

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

8.3.3. Environmental and Social Framework (ESF)

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

Table 1: Relevant Environmental and Social Standards (ESS)

Standards	Description	Project relevance
ESS1	Assessment and Management of Environmental and Social Risks and Impacts	This is a core standard guiding the ESMP. It ensures all potential risks are identified, mitigated, and monitored throughout project implementation.
ESS2	Labor and Working Conditions	Applicable to contractor and labour management; includes OHS, non-discrimination, and prohibition of forced child labour.
ESS3	Resource Efficiency and Pollution Prevention and Management	Relevant to water use, waste management, and energy efficiency.
ESS4	Community Health and Safety	Addresses risks such as traffic safety, works-related risks.
ESS5	Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	Not applicable – the land is public and officially allocated with no displacement or restrictions.
ESS6	Biodiversity Conservation and Sustainable	Relevant; promotes conservation of natural vegetation through landscaping and soil stabilization.

	Management of Living Natural Resources	
ESS8	Cultural Heritage	Applicable through the inclusion of chance-find procedures during site excavation.
ESS10	Stakeholder Engagement and Information Disclosure	Strongly relevant; ensures ongoing community engagement, transparency, and grievance mechanisms and handling procedures.

8.4. International conventions and treaties ratified by Somalia

8.4.1. Universal Declaration of Human Rights (UDHR– 1948):

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

8.4.2. International Labour Organization (ILO – 1930-1999):

During rehabilitation of the proposed feeder roads works, this protects and address forced labour, child labour, discrimination, freedom of association, and occupational safety. These conventions are directly relevant to rehabilitation activities, supporting fair labour practices, worker safety, and prohibition of child and forced labour. At biding stage, contractors' recruitment/hiring policies are screened against having zero tolerance to child or forced labor.

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

This convention, protects children from economic exploitation and hazardous work. The subproject aligns with this convention by ensuring no child labour is used and by minimizing rehabilitation-related risks to children in surrounding communities. The proposed subproject of rehabilitating primary agricultural feeder roads will not engage any child for work. Age verification assessment will be done before any work commences.

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

This convention, promotes gender equality and protects of women's rights. The rehabilitation works supports these principles through equal employment opportunities, gender inclusion, and prevention of gender-based violence and harassment. Women will be prioritized and tasked for activities that suits for them in terms culture and domestic responsibilities.

8.4.5. Convention on Biological Diversity (CBD – 1992)

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

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

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

8.4.7. Paris Agreement (2015)

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

8.4.8. Basel Convention (1989)

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

8.5. Compliance summary

Together, these World Bank frameworks, national legislation, and international conventions ensure that the rehabilitation of the primary feeder roads will be implemented in a safe, environmentally sound, socially inclusive, and responsible manner. Collectively, they provide a strong legal and ethical foundation for effective risk management, stakeholder protection, and full compliance with environmental and social requirements throughout the subproject lifecycle.

9. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

Although the risks and impacts associated with the feeder road rehabilitation works are expected to be site-specific, localized, temporary, and reversible, the implementation of three similar contracts concurrently will require strengthened coordination, supervision, and Grievance Mechanism (GM) capacity. The Ministry of Agriculture and Irrigation (MoAI), together with the State Project Coordination Units (SPCUs) and their environmental and social safeguard teams, will have close coordination to effectively supervise the three sites and monitor compliance with the World Bank Environmental and Social Framework (ESF), this ESMP, and applicable national requirements. The SPCUs and MoAI will also ensure that the GM is adequately resourced and functional across all three sites, with clear channels for receiving, recording, tracking, and resolving grievances in a timely and confidential manner. GM information, including accessible contact details and hotline numbers, will be prominently displayed at each site so that workers and affected communities can raise questions, concerns, and complaints throughout the subproject lifecycle.

9.1. Positive impacts

The rehabilitation of primary agricultural feeder roads in the selected locations will provide a timely intervention that benefits thousands of farmers and agro-pastoral communities. These communities have long faced challenges in accessing farms, nearby markets, and essential services due to the poor condition of the existing road infrastructure. Limited accessibility has constrained agricultural productivity, increased transportation costs, reduced market access, and negatively affected livelihoods. By improving

road connectivity, the subproject will enhance mobility, facilitate trade, strengthen resilience, and contribute to sustainable socio-economic development in the targeted areas.

9.1.1. Improved access to nearby markets

Rehabilitation of primary feeder roads will significantly improve year-round access to local and regional markets for farmers, livestock keepers, traders, and transporters. Better road conditions will reduce travel time and improve connectivity between production areas and market centers, enabling communities to sell agricultural produce and livestock more efficiently. Improved accessibility also facilitates access to agricultural inputs, veterinary services, extension support, healthcare facilities, schools, and other essential social services, contributing to improved livelihoods and rural development.

9.1.2. Temporary employment opportunity

Road rehabilitation activities will generate short-term employment opportunities for local communities through labour-intensive works such as vegetation clearing, earthworks, and routine maintenance. Local procurement of construction materials and services will also create indirect economic benefits for nearby businesses.

9.1.3. Prevents post-harvest losses

Poor Road conditions often delay transportation of perishable agricultural products, resulting in significant post-harvest losses. Rehabilitation of feeder roads will enable timely transportation of crops, fruits, vegetables, milk, and other agricultural commodities to markets and storage facilities, thereby reducing spoilage and quality deterioration. Improved road access will enhance market reliability, increase farmers' incomes, and strengthen food security by reducing wastage along the supply chain.

9.1.4. Reduces transportation costs

Improved Road conditions will lower vehicle operating costs by reducing fuel consumption, vehicle wear and tear, maintenance expenses, and travel time. Farmers and traders will incur lower transportation costs when moving agricultural inputs and outputs, making agricultural production more profitable. Reduced logistics costs can also contribute to more competitive market prices and improved affordability of goods and services within rural communities.

Negative impacts

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

Table 2: Negative social impacts

Impact nature	Impacts definition	Relevance to ESS
Labor tensions	An influx of jobseekers to worksite may lead to conflict and social tensions.	ESS2, ESS4
GBV, SEA & SH	Women and girls in the worksite may face potential maltreatments such as verbal or physical harassment or misconduct by workers.	ESS2, ESS4 & ESS10

Community Health and Safety Risks	Increased vehicular movement, machines, gravelling may cause safety-related risks to the workers.	ESS4
Occupational Injuries	Inconsistence use of the protective equipment may cause minor injuries to the workers.	ESS2
Temporary access disruption	Rehabilitation works may not restrict access to farms, grazing areas, nearby market access, or livestock movement. Road networks within the 1km will be alternatively used during rehabilitation works.	ESS5
Exclusion	Women, youth, and minority groups might be excluded from rehabilitation jobs opportunities.	ESS1 & ESS10

Table 3: Negative Environmental impacts

Impact nature	Impacts definition	Relevance to ESS
Waste generation	Rehabilitation works may generate solid waste. These may adversely affect the environment if not properly managed.	ESS1
Air pollution and dust	Earthworks, grading, and movement of vehicles may generate dust, affecting nearby households, farms, especially during dry seasons.	ESS3
Traffic congestion	Increased vehicular movement and transports may cause. Car accidents as already used road is under rehabilitation.	ESS4
Soil disturbances	Rehabilitation works such as increased movement may cause minor soil disturbances/erosions to the worksite.	ESS5

10. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

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

The table below presents the key environmental and social risks and impacts associated with the rehabilitation of primary Feeder Roards in the selected districts of Baxdo, Galkayo, and Dusamareb of Galmudug State of Somalia. The institutional responsibilities, monitoring indicators and timelines are also detailed within the table ensuring completeness.

10.1. Objectives of the ESMP

This plan aims to:

- Identify potential environmental and social risks associated with the rehabilitation of primary agricultural feeder roads.
- Define mitigation measures to avoid, minimize, or manage identified risks and impacts.

- Ensure compliance with the World Bank Environmental and Social Standards (ESSs), the ESMF, and national regulations.
- Promote occupational and community health and safety during project implementation.
- Define roles and responsibilities for implementing and monitoring mitigation measures.
- Support effective environmental and social monitoring, reporting, and stakeholder engagement.

Table 4: Environmental and Social Management Plan (ESMP)

Pre-rehabs Phase						
Relevant ESS	**Risks & Impacts**	**Mitigation & Enhancement Measures**	**Responsible Institutions**	**Monitoring Indicators**	**Timeframe**	**Estimated Cost (USD)**
ESS 1	Site (E&S screening)	Include E&S clauses in bid documents. Integrate waste, OHS and landscaping features into subproject design.	MoAI Engineer, & FSRP PCU	Drawings with E&S provisions; BoQs reviewed and screening report cleared.	Pre-rehabs	500
ESS5	Land ownership and site confirmation and temporary management restrictions	Receive, review and verify the land ownership letter from local respective municipality. Conduct stakeholder meeting including community. Before any work commences, communicate and mobilize the roads users including farmers, pastoralist, transportation entities to inform temporary access disruption and planned alternatives available for them to use. Galkayo & Dusamareb will be prioritized as temporary restriction more on these sites compared to Baxdo. Implement rehabs works using a phased approach.	PCU safeguards team, MoAI LA & site contractors.	Approved land confirmation letter;	Before mobilization	300

		The C-ESMP should clearly define prior notification & communication of the affected community, use of signages before work starts and implement project activities in a phased approach.				
ESS10	Stakeholder engagement and GM setup	Conduct consultations and disclose the project information to the public. Establish GM channel and focal person from the community. Be gender sensitive. Sign off CoCs. Conduct Women-only sessions.	PCU safeguards team, MoAI & LA.	Consultation minutes; GM contacts posted. CoCs signed off and community trained.	Pre-rehabs	700
Rehabilitation and upgrading Phase						
ESS3	Resources efficiency and pollution prevention & management	The site contractor shall use government/local authority approved or licensed material sources where feasible. Any new borrow area shall be screened and approved based on environmental and social criteria, including distance from settlements, water sources, agricultural/grazing areas and other sensitive locations. If new borrow areas shall be use contractors	Site Contractor / SPCU safeguards team, Local Authority and MoAi.	LA authorized water sources, borrow areas & WMP;	before site contractors start any work	Included in the BoQs

		should rehabilitate it after use. Wastes shall be separated into hazardous and none hazardous, solid and others, temporarily collected in a designated areas within sites and should be disposed to an already local authority approved dumping site. The site contractor shall implement a simple WMP covering waste segregation, reuse/recycling, safe storage, spoil management, approved transportation and disposal routes, and clear responsibilities. Suitable spoil shall be reused where feasible, while disposal in watercourses, drainage channels, agricultural land or other sensitive areas shall be prohibited. Regular water spraying and ther supressing techniqites will be utilized to manage dust (this more on Baxdo sites The Contractor shall identify water sources and estimate				

		water requirements for key activities such as compaction, dust suppression and concrete works. Water shall be obtained from authorized and sustainable sources without adversely affecting community, livestock or environmental needs. Water sources and usage shall be recorded and monitored throughout rehabilitation works. Reduce dust and use of pollutants. Limit working hours to only daytime.				
ESS3, ESS4	Noise and vibration	Restrict noisy works to daytime. Ensure maintenance of the equipment.	Contractor	Noise < 85 dB; PPE used.	Daily	Included in the BoQs
ESS3	Waste management	Provide adequate waste containers, ensure disposal through the LA designated system, and strictly prohibit open burning. Separate recyclable waste at source.	Contractor, LA & community committees	Waste logs; clean site.	Weekly	Included in the BoQs
ESS2	Occupational health and safety related risks	Train workers on OHS protocols. Provide and strictly implement the use of standards PPEs;	Site Contractor, contractors HR, MoAI & SPCU	PPE availability; accident rate = 0.	Daily	Included in the BoQs

		post safety signage, prepositioning of first-aid kit and implement heat-stress management strategies such as shade, rest breaks, drinking water. The site contractor HR should strictly ensure the implementation of all these measures throughout project lifecycle. Workers register capturing workers age, jobs category, duration and other terms should be displayable during ESS supervision visits. Site contractors display functional grievance number (hotlines/toll number) that is accessible by both communities and workers and will be posted-in in each site ensuring complaints, received, reviewed and addressed accordingly. GBV/SEA/SH-specific GM must be displayed separately considering sensitivity and confidentiality of women grievances.				

		SPCU safeguard team + MoAI will monitor full compliance according the approved ESMP/ESF.				
ESS2, ESS4	Fire and electrical safety	Provide fire safety training to the workers. Install extinguishers a conduct regular inspection. Site contractors, during the implementation of the subproject activities must comply with exiting FSRP Security Management Plans, therefore, all workers work scheduling and their rotation should fully comply with local security architectures.	Site Contractor, PCU safeguards team and MoAI	Fire-drill reports; inspection forms.	Monthly	Included in the BoQs
ESS2, ESS4	Labor tensions	Prioritize local workers and ensure CoCs signed off.	Contractor & PCU safeguards team	Signed CoCs; training records.	Quarterly	Included in the BoQs
ESS2, ESS4	GBV, SEA & SH risk	Provide GBV sensitization for all workers with particular attention to women. Disclose and post GBV-specific GM ensuring maximum confidentiality.	Contractor, PCU safeguards team	GM channels shared/posted, sensitization sessions conducted & CoC signed off.	Monthly	Included in the BoQs
ESS4	Community health and safety	limit access routes to 1 or 2, posting signages for the blocked roads during rehabs works. Restrict movement	Contractor, FSRP SPCU	Fencing intact; incident register.	Continuous	Included in the BoQ

		and the use of the feeder roads.				
ESS6	Vegetation clearing	All vegetation clearing must be confined strictly to the road prism and immediate shoulders; no cutting of mature trees unless absolutely required for safety, with prior approval by MoAI/SPCU and local authority. Where any drainage-line vegetation is disturbed, the site contractor must re-shape and stabilize these points to prevent erosion. Contractors MUST reinstate this in the C-ESMP to ensure they already have that understanding at the beginning.	Site contractor, SPCU, MoAI, Local authority.	Mature trees uncut beyond road prism, approval granted beyond road shoulders.	continuous	Included in the site contractors BoQ.
ESS8	Chance-find procedures	Stop-work, delineate find, secure area, notify MoAI and relevant authority, evaluation by competent authority, and explicit clearance required before resuming works. CFP template attached in the annex section.	Contractor, MoAI, local Authority & SPCU	Chance-find report and clearance.	As required	Included in the BoQ
Operation Phase						

ESS3,	Solid and liquid waste management	Routine cleaning; compost organic waste; maintain drainage.	MoAI & LA	Clean roads; waste records.	Continuous	Included in the BoQ
ESS4	Traffic and roads safety measures	The Contractor shall prepare a simple site-level Traffic Management Plan (TMP) as part of the C-ESMP, covering speed limits and controls, appropriate signage and locations, flagmen/traffic marshals, work-zone delineation, working hours. The screening did not identify sensitive receptors such as schools, water points, health posts, however the contractor shall also revisit the sites looking the reconfirming sensitive receptors on a simple site sketch and reflect them in the TMP. CoCs containing mandatory GBV/SEA/SH provisions shall be signed by all workers. The GM shall provide confidential, GBV-sensitive reporting pathways and survivor-centred referrals. Contractual sanctions for CoC violations shall include warnings,	Site contractor, MoAI, SPCU	Speed limits <30, CoC signed off, workers trained; attendance records.	Continuous	Included in site contractors BoQ

		removal from the site, and contract termination for severe cases.				
ESS2	Worker health and safety	Provide PPE; train on hygiene and emergency response.	Contractor & E&S team	OHS audit records; incident log.	Monthly	Included in the BoQ
ESS1, ESS10	Gender inclusion	Increase number of female representations in decision-making and Allocate stalls for women vendors; include women in the community committees. Sensitize on GBV, SEA and SH reporting channels. Stakeholder engagement under this ESMP shall be implemented in accordance with and explicitly aligned with the S-FSRP Stakeholder Engagement Plan (SEP). SEP activities shall include information disclosure, consultations, and ongoing communication with affected communities and other stakeholders. All these shall be consistent with the principles, procedures, and requirements established in the S-FSRP approved SEP.	LA & MoAI	≥ 30 % female representation.	Quarterly	N/A

		The contractor will establish accessible site-level channels for workers and communities to raise complaints directly at the worksite. These complaints shall be recorded and promptly referred to the SPCU project-level GM focal points. They receive, review and address according to preset timeframes and appropriate follow-up and resolution. NPCU will handle higher and sensitive cases beyond the capacity of the SPCU. They will also provide guidance to SPCU. The contractor's mechanism will therefore feed into, and not operate separately from, the project-level GM				

11. CAPACITY-BUILDING PLANS

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

The following objectives should be focused on capacitating these stakeholders:

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

Table 5: Capacity-building plan

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

Community Health, Safety, and Waste Management	community committees, farmers, agropastoral and drivers.	Hygiene, waste segregation, sanitation practices, water use efficiency, and animal and medicinal waste handling and safe access.	MoAI & Contractors.	During early operation and annually as a refresher	Included in the BoQ budget
GBV, SEA & SH Prevention and reporting mechanisms	Project contractors, community reps, women, youth leaders and site workers and drivers.	Code of Conduct, GBV, SEA SH sensitization sessions survivor-centered referral pathways, and GM operationalization.	PCU safeguards team, MoAI	Pre-construction and semi-annually	$600
Training on Stakeholder Engagement specific to the two communities	Community committees, LA reps and farmers and road users (drivers)	Project objectives scope and duration. E&S risks and their mitigation strategies.	E&S team & MoAI	Preconstruction	$1,000
Training on Grievance Mechanism operations (ESS10), including GBV pathways	Contractors E&S officer, LA, community committees and farmers.	GM reporting channels and confidentiality and autonomic aspect.	MoAI, PCU safeguards team	Pre-construction and Annual refresher	$1,500

12. IMPLEMENTATION ARRANGEMENTS

12.1. Government responsibilities

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

12.2. Institutional Roles and responsibilities

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

MoAI	• The MoAI is responsible for the overall implementation of the Project including monitoring of implementation of this ESMP. • Responsible for the long-run supervision and management to ensure operationalization of the rehabilitated primary feeder roads. • Establish and manage (in collaboration with Local Authorities) the community structures (inclusive in representation) that will run daily activities including maintenance.
MoECC	• The ministry plays a regulatory oversight, and advisory role in the rehabilitation of the primary feeder roads particularly, ensures that E&S safeguards are properly integrated through the subproject lifecycle. • At the planning stage, it reviews the screening reports and determine whether the rehabs activities are environmentally suitable and sound to the proposed sites.
SPCU	• SPCU E&S safeguard team will prepare the site-specific ESMP for the subproject. • Oversee the implementation of the site-specific mitigation measures for already identified environmental and social impacts. • Conduct all capacity-building training to ensure smooth implementation. • Prepare and submit quarterly reports outlining E&S performances • Co-manage subproject implementation budget.
Contractor	• The contractor will implement the works based on the agreed design by adopting best construction codes and most environmentally-sound design measures. • The Contractor will reconfirm site-specific risks and prepare a Contractor's ESMP (C-ESMP) before commencing work, by adopting all pertinent E&S mitigation measures in this site-specific ESMP, and customizing them according to the site and work specifics • The Contractor will be responsible for implementing their C-ESMP throughout the contract lifetime. • Implement site-specific mitigation measures and report any unforeseen challenges to the MoAI and SPCU. • Prepares monthly contractors report and submits to the SPCU E&S team.

Community structures	• Manages community relations, GM records, and coordination with MoAI and the local authorities. • Conducts routine inspections and reports environmental or social concerns for follow-up.
Local Authorities	• The district authorities locally supervise the compliance with proper usage of the rehabilitated roads, • Takes community grievances and concerns up to their level and • Participates coordination meetings and monitoring exercises. • Takes the responsibility of the feeder roads insuring proper use and maintenance.

12.3. Contractors and Sub-contractors

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

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

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

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

Table 6: Reporting plan

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

13. PUBLIC CONSULTATION AND FEEDBACK

Stakeholder consultation meetings were conducted from **May 18th - 22nd, 2026** across the targeted locations. Each consultation brought together approximately **20 participants**, with **at least 30% women representation**. Participants included farmers cooperatives, traders, drivers, pastoralists, local authorities, district representatives, and officials from the State Ministry of Agriculture. A stakeholder mapping exercise identified primary stakeholders directly affected by the subproject, including women, youth, elders, herders, traders, cooperatives, and government representatives, and secondary stakeholders comprising relevant line ministries and local authorities. Stakeholders were mapped based on their influence, interest, relevance, and potential impact on the subproject.

The consultations ensured inclusive participation of all community groups, including women, youth, and persons with disabilities, providing a platform to discuss environmental and social risks, anticipated impacts, and proposed mitigation measures. The project team disclosed key project information, including the scope, objectives, implementation timeline, and expected duration, and presented the findings of the environmental and social screening. Discussions also covered site-specific risks and mitigation measures, institutional roles and responsibilities, coordination mechanisms, worker management procedures, Occupational Health and Safety (OHS), grievance mechanisms, accessibility and inclusivity measures, and compliance with the World Bank Environmental and Social Framework (ESF) and relevant Environmental and Social Standards (ESSs).

Participants agreed on several priority actions, including appointing a Safeguard Focal Point, finalizing and disseminating the environmental and social screening report, operationalizing the grievance mechanism, integrating inclusivity and safety measures into project design and procurement, and strengthening monitoring, transparency, and safeguard compliance throughout project implementation. In addition, outreach was conducted with neighbouring communities to inform them about the rehabilitation works, expected impacts, and planned mitigation measures.

Overall, stakeholders expressed a clear understanding of and commitment to the project and its safeguard requirements. The proposed project land was confirmed to be government-owned with no reported ownership disputes. Community concerns and recommendations will be incorporated into the Environmental and Social Management Plan (ESMP). Participants emphasized the importance of strong coordination among all stakeholders and acknowledged that potential construction and operational risks including noise, vibration, soil disturbance, and Gender-Based Violence (GBV) risks are expected to be minor, temporary, and manageable through the implementation of the proposed mitigation measures in accordance with the project's ESF and ESMP.

14. GRIEVANCE MECHANISM (GM)

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

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

14.1. Objective

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

14.2. Scope of Grievances

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

14.3. Institutional Responsibility

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

14.4. GM Escalation levels

14.4.1. Contractor:

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

14.4.2. SPCU Staff:

At the state level, the Safeguarding Team, particularly the Social Safeguards Specialist, will be responsible for receiving grievances through established channels such as hotlines, phone calls, or email. In

accordance with the grievance resolution protocols, the Social Safeguards Specialist will manage cases confidentially and within the specified timelines. Feedback will be provided to complainants within the defined timeframe, clearly indicating the response and actions taken to address the concern.

14.4.3. NPCU:

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

14.5. GM accessibility

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

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

14.6. Contractor-Level Grievance Intake

Contractors will be responsible to maintain a site-level grievance and ensuring gender responsive implementation of the modern rehabilitation of these feeder roads in Baxdo, Galkayo and Dusamareb district. The constructor should be;

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

14.7. GM Structure and Coordination

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

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

14.8. Grievance Submission Channels

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

14.9. Grievance Handling Process

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

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

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

Separate, confidential reporting channel established for Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). These should be handled in survivor-centred approach while confidentiality and non-retaliation actions strictly adhered throughout. No requirement to use the standard GM. Referral to appropriate support services will be immediately encouraged and enhanced.

14.11. Confidentiality

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

14.12. World Bank GM

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

14.13. Monitoring, Reporting, and Continuous Improvement

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

15. ESMP IMPLEMENTATION AND CAPACITY-BUILDING BUDGET

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

All costs associated with the preparation and implementation of the Contractor’s Environmental and Social Management Plan (C-ESMP) shall therefore be borne by the Contractor and reflected within the

BoQ under relevant sections, ensuring that no separate budget allocation is required for ESMP implementation outside the contract value.

Table 7: Capacity-building plans and budget

Topics	Target institutions/groups	Responsible entity	Budget
EHS induction training and safety toolbox talks,	Subproject managers, E&S focal persons	SPCU & MoAI	$1, 200
Emergency Preparedness and Response Plan (EPRP)	the EPRP will be prepared in line with project guidelines	SPCU	$2,500
Stakeholder and public consultations meetings	Resident community, MoAI staff and contractor	SPCU	$6,000
Environmental and Social Grievance Mechanism (E&S GM),	Site-specific GM will be established and GM sensitization sessions will be conducted	Contractor & SPCU	$3,000
GBV/SEA/SH prevention and response services;	All workers	SPCU E&S team	$2,500

16. ANNEXES

16.1. Attendance Sheets







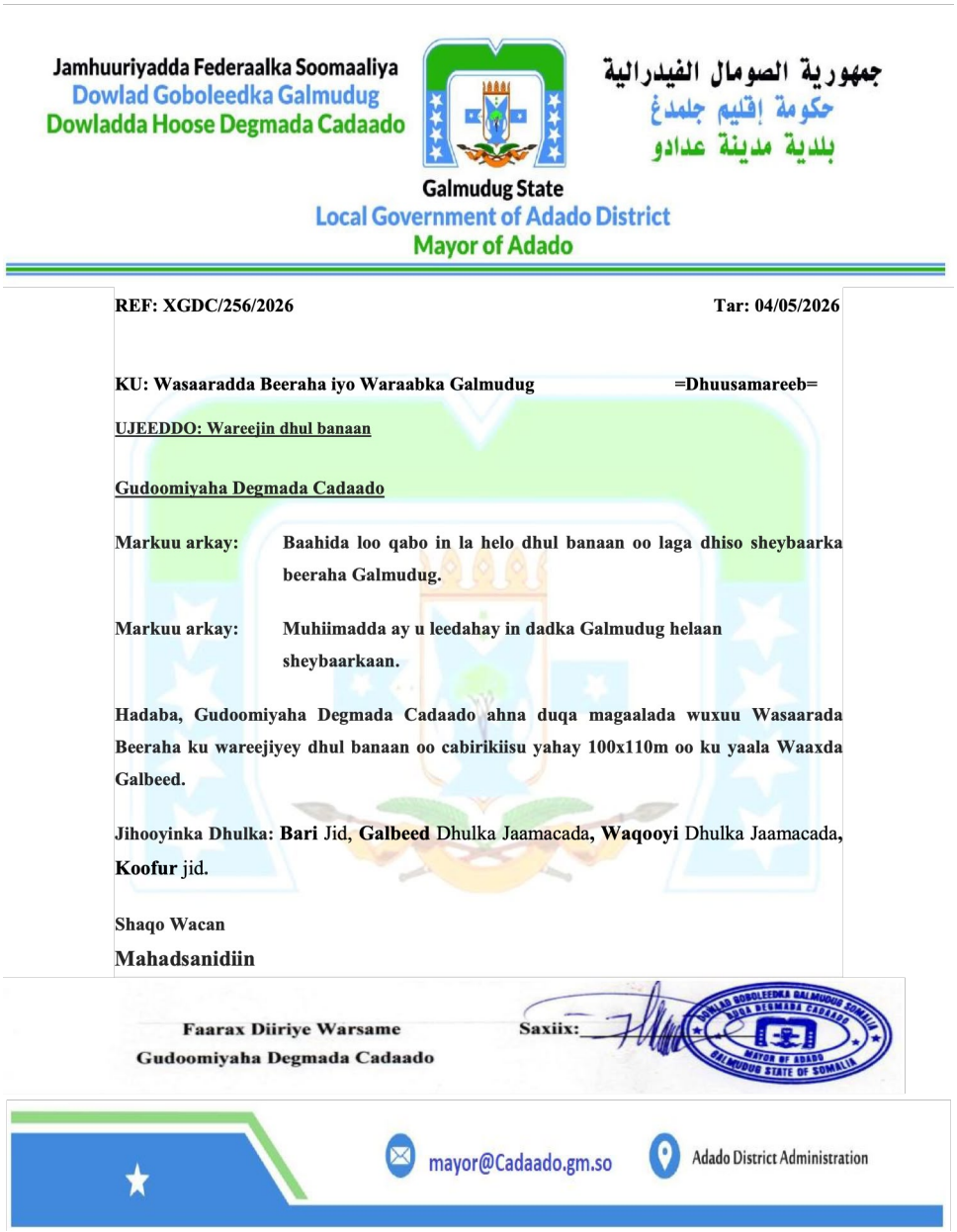
16.2. Designs



16.3. Chance Find Procedure template



16.4. Baxdo Land ownership centificate



Jamhuuriyadda Federaalka Soomaaliya
Dowlad Goboleedka Galmudug
Dowladda Hoose Degmada Cadaado

جمهورية الصومال الفيدرالية
حكومة إقليم جلمدغ
بلدية مدينة عدادو

Galmudug State
Local Government of Adado District
Mayor of Adado

REF: XGDC/256/2026 **Tar: 04/05/2026**

KU: Wasaaradda Beeraha iyo Waraabka Galmudug **=Dhuusamareeb=**

UJEEDDO: Wareejin dhul banaan

Gudoomiyaha Degmada Cadaado

Markuu arkay: **Baahida loo qabo in la helo dhul banaan oo laga dhiso sheybaarka beeraha Galmudug.**

Markuu arkay: **Muhiimadda ay u leedahay in dadka Galmudug helaan sheybaarkaan.**

Hadaba, Gudoomiyaha Degmada Cadaado ahna duqa magaalada wuxuu Wasaarada Beeraha ku wareejiyey dhul banaan oo cabirkiisu yahay 100x110m oo ku yaala Waaxda Galbeed.

Jihooyinka Dhulka: Bari Jid, **Galbeed** Dhulka Jaamacada, **Waqooyi** Dhulka Jaamacada, **Koofur** jid.

Shaqo Wacan
Mahadsanidiin

Faarax Diiriye Warsame
Gudoomiyaha Degmada Cadaado

Saxiix:

mayor@Cadaado.gm.so Adado District Administration

16.5. Dusamareb Land ownership Certificate

JAMHUURIYADDA FEDERAALKA SOOMAALIYA
DOWLADGOBOLEEDKA GALMUDUG
MAAMULKA CAASIMADDA DHUUSAMAREEB
XAFIISKA GUDOOMIYAHA

Federal republic of Somalia
Galmudug state of Somalia
Administration of Dhusamareeb
Commissioner office

جمهورية الصومال الفدرالية
الدولة الإقليمية جلمدج
إدارة طوسمريب
مكتب الوالي

SUMAD: DGD/DHCDH/ 00620/2022 **Tr: 11/05/2022**

KU: **Cidwalba ay quseyso** =Dhusamareeb=

Og: Laamaha Amniga Dowlad Goboleedka Galmudug =Dhusamareeb=

Ujeedo: Cadeeyn lahaansho Dhulkii hore ee dhirta iyo daaqa

Gudoomiyaha degmada dhuusomareeb ahna duqa Caasimaddu wuxuu caddeynayaa lahaanshaha Dhulkii hore ee dhirta iyo daaqa in ay leedahay **wasaarada Beeraha Dhirta iyo Daaqa Dowlad Goboleedka Galmudug** dhulkaas oo kuyaal meel udhow madaxtooyada kagana aadan koorfur, dhulkaas oo cabirkiisu dhanyahay **100M X 100M** (Boqol mitir oo lagu dhuftay Boqol mitir) dhulkaas oo xarun unoqon doono **wasaarada Beeraha Dhirta iyo Daaqa** Dowlad Goboleedka Galmudug .

Sidaa darteed waxaa lala socod siinayaa cidkasta oo dhulkaan ku howlan in ay dano gaar ah u isticmaasho ama islaysiiso in uu yahay hanti dowlo, hanti dowlana cid gaar ah aysan yeelan karin ama is xijin karin.

F.G : Waxaa ka reeban in laga dhiso dhismo aysan ogayn wasaaradu.

Mahadsanid

Xafiiska Gudoomiyaha Ahna Duqa Caasimadda Dhuusamareeb

Cabdiraxman Cali Maxamed (Kiiraha Dorow)

Xafiiska Gudoomiyaha- ahna Duqa Caasimadda
Dhuusamareeb – Galmudug – Somalia
Email: Info@dusamareb.gm.so
Xiriir No: 252614684444

16.6. Galkayo Land Ownership certificate

Jamhuuriyadda Federaalka Soomaaliya
Dowlad Gobolleedka Galmudug
Dowladda Hoose Degmada Galkacyo

جمهورية الصومال الفيدرالية
حكومة اقليم جلمـــدج
بلدية مدينة جالكعيو

Federal Republic of Somalia
Galmudug State
Local Municipality of Galkaio District
Office of the Mayor

TIX: DDG /0464/05/26 *Tr: 25/05/2026*

Ku: Wasaaradda Beeraha & Waraabka Galmuudg **=Dhuusamareeb=**
Og: Xoghayaha Dowladda Hoose Degmada Gaalkacyo **=Gaalkacyo=**
Og: Guddoomiye kuxigeenka Degmada Gaalkacyo **=Gaalkacyo=**

Ujeeddo: Dayactirka Waddooyinka Mara Beeraha Degmada Gaalkacyo

Guddoomiyaha Degmada Gaalkacyo,

Markuu arkay: Baahida loo qabo in dayactir loo helo waddooyinka

Markuu arkay: Muhiimadda ay u leedahay adeegga bulshada

Hadaba Guddoomiyaha Degmada Gaalakcyo ahna Duqa Magaaladu wuxuu Wasaaradda Beeraha iyo Waraabka Dowladda Galmudug ka codsanayaa inay dayactir ku sameeyaan waddooyinka mara beeraha Degmada Gaalkacyo.

Waxaan rajaynaynaa in ay Wasaaradda Beeraha iyo Waraabka Dowladda Galmudug kasoo jawaabto codsigeenna islamarkaana ay dayactirto waddooyinka mara beeraha si loo fududeeyo shaqooyinka iyo wax soo saarka beeraha ee Degmada Gaalkacyo.

Mahadsanidiin,

Md. Cabdiraxmaan Sheekh Xasan Jimcaale
Guddoomiyaha Degmada Gaalkacyo

DOWLAD GOBOLEEDKA GALMUDUG SOOMALIA
DUQA DEGMADA GAALKACYO
MAYOR OF GALKACYO
GALMUDUG-STATE OF SOMALIA

DOWLADA HOOSE EE DEG. GALKACYO

Local Municipality of Galkayo District, Galmudug State of Somalia
Email: mayor@galkacyo.gm.so / info@galkacyo.gm.so
Tell: +252-61-5888981/+252-90-7795669

16.7. **Photos:**


GPS Map Camera
Check In
--,Galgaduud,Somalia
Baxdo - Adado road, Baxdo district-Galgaduud Somalia, --, Galgaduud , Somalia
Lat 5.804984, Long 47.196532
Tuesday, 19/05/2026 10:03 GMT+03:00
Note : Captured by GPS Map Camera


FSRP