DAWLADA PUNTLAND
EE SOOMAALIYA

PUNTLAND STATE
OF SOMALIA

Ministry of Agriculture and Irrigation

Wasaaradda Beeraha iyo Waraabka.

Somalia Food Systems
Resilience Project "P177816

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Activity Title:

Rehabilitation of Galgala Feeder Road Project, Bosaso District, Bari Region

For:

Food Systems Resilience Project (FSRP) – Puntland Component

Date: October 2026

Project Coordinates:

10°58'04.9"N 49°04'35.3"E

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LIST OF ABBREVIATIONS

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

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1. Executive Summary

The Environmental and Social Management Plan (ESMP) for the Rehabilitation of Galgala Feeder Road in Bosaso District, Bari Region, Puntland State of Somalia has been prepared under the Somalia Food Systems Resilience Project (S-FSRP), financed by the World Bank. The subproject falls under Sub-component 3.2: Market Infrastructure and Enterprise Development and aims to improve connectivity between agricultural production areas and markets, reduce transportation constraints and crop losses, and improve access to essential services. The ESMP has been prepared in accordance with the S-FSRP Environmental and Social Management Framework (ESMF), the World Bank Environmental and Social Framework (ESF) and applicable Federal and Puntland environmental and social requirements.

The Galgala Feeder Road is an existing gravel road approximately 2.5 km (2.471 km design chainage) long, passing through hilly and rock-outcropped terrain. Existing road conditions are characterized by erosion, potholes, localized washouts, steep sections and inadequate drainage, which constrain the movement of people, agricultural produce and other goods and services. The proposed rehabilitation works include approximately 400 m of reinforced concrete Irish crossing, 375 m of gravel road realignment, 100 m of concrete V-shaped side drain, rehabilitation of existing concrete crossings, and general grading, pothole repair and shoulder reinstatement along the remaining road sections.

The environmental and social screening classified the subproject as Moderate Risk. The principal risks include soil disturbance and erosion from earthworks; dust and noise; construction and solid waste; alteration of natural drainage; fuel and oil spills; localized vegetation disturbance; occupational health and safety risks; construction traffic and road safety; temporary disruption of community and farm access; labor and working-condition risks; worker-community interactions; SEA/SH risks; and potential chance finds during excavation and other earth-disturbing activities. These impacts are expected to be temporary, localized and manageable through implementation of the mitigation and monitoring measures established in this ESMP.

Particular attention will be given to OHS, construction traffic and community road safety, erosion and runoff management, drainage protection, material sourcing, waste and spill management, and maintenance of safe community access during construction. The Contractor will be required to prepare and implement a Contractor's ESMP (C-ESMP), appropriate OHS and traffic management measures, provide PPE, conduct toolbox talks, maintain incident records, implement the Workers' Code of Conduct and SEA/SH prevention measures, and submit regular E&S compliance reports.

The Galgala Feeder Road is an existing public road and right-of-way (ROW). Bosaso Local Government has confirmed that the road corridor is public land/public infrastructure under government jurisdiction and is free from known private ownership disputes. The proposed

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rehabilitation works will remain within the confirmed public road corridor/ROW. Therefore, no private land acquisition, voluntary land donation, physical displacement or economic displacement is anticipated, and no RAP or VLD documentation is required.

Stakeholder consultations involving local authorities, community representatives, farmers, women, youth and road users demonstrated strong support for the rehabilitation. Key concerns included poor road conditions, difficult access during rainfall, transportation constraints, crop losses, access to markets and services, timely implementation, local employment opportunities, community safety and continued consultation. The S-FSRP Grievance Mechanism, including Hotline 3060, will remain accessible throughout implementation, with confidential and survivor-centered arrangements for SEA/SH-related complaints.

Implementation of the ESMP will require coordination among MoAI/S-FSRP, the SPCU Safeguards Team, relevant road authorities, Bosaso District Administration, the Supervising Engineer, the Contractor and community representatives. The Contractor will have primary responsibility to prepare C-ESMP for implementing site-level mitigation measures, while the Supervising Engineer and SPCU will monitor compliance, reporting, incident management and corrective actions.

The estimated ESMP implementation budget is USD 16,500, covering measures including PPE, safety and warning signage, traffic management, dust suppression, waste management, erosion and drainage controls, community awareness, SEA/SH prevention, stakeholder engagement, grievance management, and environmental and social monitoring.

Overall, the ESMP concludes that the Rehabilitation of Galgala Feeder Road can be implemented with manageable environmental and social risks, provided that the mitigation, monitoring and institutional measures specified in this ESMP are effectively implemented. The project is expected to improve road accessibility and connectivity, reduce travel time and transportation costs, reduce crop losses, improve farmers' access to markets and essential services, strengthen local economic opportunities, improve drainage and erosion control, and contribute to the resilience of agricultural communities in Galgala.

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2. Introduction

2.1 Project Overview

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

S-FSRP supports national and sub-national efforts to improve irrigation capacity and irrigation-supported crop yields, market access and sustainable management of natural resources while addressing vulnerabilities caused by dry season water shortage, water access limitations and weak value chains. The project aligns with Somalia's long-term vision of achieving food security and economic stability through sustainable and inclusive development.

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

In Puntland, under Sub-component 3.2: Market Infrastructure and Enterprise Development, the project is supporting the Rehabilitation of Galgala Feeder Road in Bosaso District, Bari Region. The intervention aims to improve road connectivity between agricultural production areas and markets, enabling farmers to transport agricultural produce and inputs more efficiently and improving access to essential services.

The Galgala Feeder Road is an existing gravel feeder road approximately 2.5 km (2.471 km design chainage) long, passing through hilly and rock-outcropped terrain. The road is currently in poor condition, with eroded sections, potholes, localized washouts and steep sections that create difficulties for vehicles transporting agricultural produce.

The subproject focuses on rehabilitation and improvement of the existing feeder road. The proposed works include approximately 400 m of new concrete Irish crossing, 375 m of gravel road realignment, 100 m of concrete V-shaped side drain, rehabilitation of existing concrete crossings, and general grading, pothole patching and shoulder reinstatement along the remaining road sections.

The rehabilitation will largely follow the existing public road corridor/right-of-way, including improvement of sections affected by erosion, runoff and poor road conditions. Bosaso Local Government has confirmed the Galgala Feeder Road and its existing right-of-way as public

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land/public infrastructure. No land acquisition, physical displacement or economic displacement is anticipated.

Community consultations identified poor road conditions, high transportation costs, crop losses and limited market access as key challenges. The rehabilitation is expected to reduce travel time and transportation costs, reduce crop spoilage, improve farmers' access to markets and strengthen access to essential services and economic opportunities.

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

The purpose of this Environmental and Social Management Plan (ESMP) is to identify, evaluate and manage the environmental and social risks associated with the implementation of the Rehabilitation of Galgala Feeder Road. The ESMP ensures compliance with the World Bank Environmental and Social Framework (ESF), particularly the Environmental and Social Standards (ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8 and ESS10; ESS7 and ESS9 are not triggered by this subproject) and with Puntland State environmental legislation, including the Environmental Impact Assessment Act (2023).

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

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

2.3 Scope of the ESMP

This ESMP applies to all phases of the Rehabilitation of Galgala Feeder Road including:

- Site preparation, surveying, clearing, earthworks, grading and compaction associated with road rehabilitation
- Construction of approximately 400 m of concrete Irish crossing, 375 m of gravel road realignment and 100 m of concrete V-shaped side drain
- Rehabilitation of existing concrete crossings, pothole repair, grading and shoulder reinstatement along the remaining road sections
- Sourcing, transportation and management of gravel, aggregates and other construction materials

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- Management of environmental risks such as dust, noise, construction waste, soil erosion, runoff, drainage, spills and pollution during construction activities
- Occupational health and safety measures for workers and community health and road safety measures for road users and surrounding communities
- Stakeholder engagement, consultations and GM mechanisms
- Monitoring, compliance and institutional arrangements for the rehabilitation and subsequent operation and maintenance of the feeder road.

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

2.4 Methodology

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

a. Field Observations and Site Assessments

A technical team conducted site visits to assess the condition of the existing Galgala Feeder Road, road alignment, drainage and crossing structures, proposed realignment section, and locations requiring road improvement. The assessment also considered terrain, road accessibility, surrounding land use, agricultural areas, community access and environmentally sensitive receptors. GPS coordinates, photographs and site measurements were collected along the road corridor.

b. Desktop Review

A review of relevant documents, including:

- Galgala Feeder Road engineering design and technical assessment report
- Topographic survey, geotechnical investigation and proposed road design information
- World Bank ESS1–ESS10
- Puntland environmental and labor legislation.

The desktop review also considered the confirmed public road/right-of-way documentation and the proposed rehabilitation works within the existing public road corridor.

c. Environmental & Social Screening

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The S-FSRP screening checklist was applied to determine risk levels, ESS applicability and required mitigation measures. The project was classified as Moderate Risk, considering potential impacts associated with earthworks, road realignment, drainage and concrete works, material sourcing and transportation, dust and noise, erosion and runoff, occupational health and safety (OHS), construction traffic, community safety.

This ESMP is based on the environmental and social screening conducted on 20 July 2026 (Annex 10.2), which classified the subproject as Moderate Risk and identified relevant risks under ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8 and ESS10. The screening summary table in Annex 10.2 identifies the applicable E&S instruments and measures, including this site-specific ESMP, the Contractor's ESMP (C-ESMP) and associated sub-plans, Labour Management Procedures, stakeholder engagement and grievance arrangements, and the Chance Finds Procedure. These requirements are carried forward into the mitigation and monitoring measures in Chapters 6 and 7 and Annexes 10.4 and 10.5. ESS7 and ESS9 were screened and are not triggered, while no RAP or voluntary land donation documentation is required under ESS5.

d. Stakeholder Consultations

Meetings with Galgala community representatives, local authorities, farmers, women and other road users were conducted to:

- Identify existing road-access challenges and community priorities
- Discuss environmental and social risks
- Share information on GM (FSRP Hotline 3060)
- Confirm community support for the proposed feeder road rehabilitation.

2.5 Project Activity Description

The proposed Rehabilitation of Galgala Feeder Road aims to improve reliable road access between agricultural production areas and markets through the rehabilitation and improvement of approximately 2.5 km of existing feeder road. The intervention is designed to improve road accessibility, reduce transportation constraints and costs, reduce crop losses during transportation, and improve farmers' access to markets and essential services.

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Key project components include:

- **Construction of Concrete Irish Crossing**
  Construction of approximately 400 m of new reinforced concrete Irish crossing from CH 0+000 to CH 0+400 to address recurrent washouts and improve safe and reliable access during periods of runoff.
- **Gravel Road Realignment**
  Reconstruction/realignment of approximately 375 m of gravel road from CH 0+400 to CH 0+775 to replace the existing rough route and provide a more stable and functional road connection.
- **Drainage Improvement**
  Construction of approximately 100 m of concrete V-shaped side drain from CH 0+825 to CH 0+925 to intercept hillside runoff, control erosion and protect the gravel carriageway.
- **Rehabilitation and General Road Improvement**
  Rehabilitation of existing concrete Irish crossings and general grading, pothole patching and shoulder reinstatement along the remaining sections of the feeder road.
- **Road Commissioning and Handover**
  Inspection and commissioning of the completed road, crossings and drainage structures to confirm functionality and compliance with the approved design before handover.

Road Rehabilitation – Workforce Composition

The implementation of the Rehabilitation of Galgala Feeder Road Project activities will engage an estimated 35 workers during peak periods. The workforce composition is as follows:

- **Total workers:** 35
- **(Semi -)Skilled workers:** 12
- **Unskilled workers:** 19
- **Engineers and site management team:** 4

In terms of origin:

- **Local community workers:** 24 (mainly unskilled and semi-skilled labor)
- **Workers from outside the project area:** 11(engineers and site management staff only) will be hired from Bosaso, within the same district as the project site

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

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3. Policy, Legal and Administrative Framework

3.1 Introduction

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

3.2 National Legal and Regulatory Framework

a. Provisional Constitution of Somalia

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

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

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sustainable manner. The project will ensure that all land-related aspects are managed in accordance with this provision and applicable ESF standards.

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

b. Federal Level Legislation

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

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in accordance with the Penal Code, where the survivor consents to such referral. The project's GM includes provisions for confidential referral pathways consistent with survivor-centered principles.

- **Public Health Legislation**
  Federal public health legislation supports prevention of disease transmission, protection of community health and safety, and environmental sanitation practices. The project contributes to these objectives through its community health and safety measures and environmental mitigation measures during implementation.

c. Puntland State Legislation

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

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- **Puntland Disaster Risk Management Policy, 2024**
  This policy emphasizes integration of climate resilience and disaster preparedness into development projects, community-based early warning systems, and strengthening of institutional capacity for hazard mitigation. The project supports these objectives through its design and mitigation measures.

3.3 World Bank Environmental and Social Framework (ESF)

The ESF comprises ten Environmental and Social Standards (ESSs). The following ESSs are applicable to the Galgala Feeder Road Rehabilitation.

Table 1: WB ESSs

ESS	Title	Relevance to the Project
ESS1	Assessment and Management of Environmental and Social Risks and Impacts	Provides the overarching framework for ESMP preparation.
ESS2	Labor and Working Conditions	Applies to all workers; governs OHS, fair treatment, and labor rights. Key risks include operation of machinery, earthworks, excavation, concrete works and construction traffic.
ESS3	Resource Efficiency and Pollution Prevention	Relevant for waste management, energy use, water distribution, dust and noise emissions, fuel and oil management and construction waste.
ESS4	Community Health and Safety	Applies to manage community and livestock and domestic water users' safety risks from open work areas, dust, noise and worker-community interaction during implementation
ESS5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	The Galgala Feeder Road is an existing public road/right-of-way. Bosaso Local Government has confirmed that the road corridor is public land and free from known ownership disputes. The rehabilitation works will remain within the confirmed public road corridor/right-of-way, and no land acquisition, physical displacement or economic displacement is anticipated.
ESS6	Minor disturbance to vegetation and fauna along the existing feeder-road corridor and at drainage and crossing works; no critical or natural habitats are present.	Relevant with low risk. Minor and localized vegetation disturbance may occur during road rehabilitation, realignment, drainage works and associated earthworks. Unnecessary vegetation clearance will be avoided and disturbed areas reinstated where appropriate

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ESS8	Accidental uncovering of objects of cultural and/or archaeological value	Relevant with low risk. Excavation and earthworks could result in accidental discovery of cultural or archaeological materials. A Chance Finds Procedure will therefore be applied during construction
ESS10	Stakeholder Engagement and Information Disclosure	Mandatory consultations and GM integration throughout the project.

3.4 International Conventions and Agreements

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

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

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

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4. Project Area Description

4.1 General Location

The proposed Rehabilitation of Galgala Feeder Road will be implemented in Galgala, Bosaso District, Bari Region, Puntland State of Somalia. Galgala is an agricultural community where livelihoods depend largely on farming and the movement of agricultural produce to local markets. The existing feeder road provides an important transport connection for farmers, communities and other road users.

The approximately 2.5 km feeder road is an existing rough gravel track passing through hilly and rock-outcropped terrain. The road has deteriorated due to erosion, recurrent runoff and washouts, potholes and inadequate drainage, resulting in difficult vehicle access and increased challenges in transporting agricultural produce. The proposed intervention will rehabilitate the existing road through construction of a concrete Irish crossing, gravel road realignment, construction of a concrete V-shaped drain, rehabilitation of existing crossings, grading, pothole repair and shoulder reinstatement. The road is already used by local communities and provides access to surrounding agricultural production areas, facilitating the movement of people, agricultural produce, inputs, equipment and services.

GPS coordinates recorded during the field assessment are: **10°58'04.9"N 49°04'35.3"E.**



Figure 1: Galgala Village site map

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4.2 Land Ownership and Tenure

The proposed Galgala Feeder Road rehabilitation activities will be implemented within the existing public road corridor and right-of-way (ROW). The road is an existing public feeder road that has been used by the local community and other road users for generations. Bosaso Local Government has confirmed that the existing road corridor and ROW are public land/public infrastructure under government jurisdiction and administration.

The proposed rehabilitation works, including the concrete Irish crossing, gravel road realignment, drainage works, rehabilitation of existing crossings, grading and associated road improvements, will be undertaken within the confirmed public road corridor/ROW. No land acquisition is anticipated for project implementation.

The project does not involve private land acquisition, voluntary land donation (VLD), physical displacement or economic displacement. Based on the confirmed project footprint and land/ROW status, no involuntary restriction on land use is anticipated and ESS5-related impacts are not expected.

Land/ROW verification and community consultations confirmed that:

- The Galgala Feeder Road is an existing public road and right-of-way under government jurisdiction and administration
- The road corridor required for the proposed rehabilitation works is public land and is free from known private ownership claims, encumbrances and land disputes
- No land acquisition, physical displacement, economic displacement or loss of private assets is anticipated
- The rehabilitation works will be confined to the confirmed public road corridor/ROW and will not permanently restrict community access or surrounding agricultural activities
- The rehabilitation is supported by the community as an important intervention to improve road access, transportation of agricultural produce, market connectivity and local livelihoods.

As no land acquisition or land donation is required, VLD documentation and a Resettlement Action Plan (RAP) are not required. All project activities will be implemented within the confirmed public road corridor/ROW, with measures in place to avoid impacts on private land, access rights, assets and community livelihoods.

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4.3 Accessibility and Infrastructure

Access Roads

The project sites are connected to existing local access roads and narrow mountain tracks linking Galgala Village to Bosaso District. The area is characterized by rugged and hilly terrain, making access difficult, particularly for heavy construction equipment and material transport. While the roads are generally passable during the dry season, access may become challenging or temporarily disrupted during periods of heavy rainfall due to steep gradients, erosion and poor road conditions. Appropriate transport planning and safety measures will therefore be required during project implementation.

Water Supply

Water required for construction activities, including concrete works, dust suppression and other site needs, will be obtained from approved and suitable sources. The contractor will ensure that construction water abstraction does not interfere with community water needs or agricultural activities. Fuel, oils, construction waste and other pollutants will be properly managed to prevent contamination of nearby water sources and drainage pathways.

Electricity

The road rehabilitation works do not require permanent grid electricity. Temporary power required during construction will be provided through contractor equipment or other appropriate temporary power sources where necessary. No permanent electrical infrastructure is proposed as part of the road rehabilitation works.

Communication and Internet

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

4.4 Social Conditions

- **Socio-economic Context**: Galgala is a rural agricultural community in Bosaso District, Bari Region, where livelihoods depend primarily on agriculture and associated trade and transport activities. The existing feeder road is important for connecting farming areas with markets and services. Poor road conditions, including erosion, potholes and washouts, increase transportation difficulties and costs and affect the movement of agricultural produce.
- **Livelihoods:** The primary livelihood activity is agriculture. Farmers depend on the Galgala Feeder Road to transport agricultural produce to markets, obtain agricultural inputs and

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access other goods and services. Improved road conditions are expected to support market access and reduce transportation constraints and crop losses.

- **Women and Youth:** Women contribute to household livelihoods through farming activities, small-scale trade and domestic responsibilities. Youth are actively engaged in agriculture and other income-generating opportunities within the community. Improved road access is expected to benefit women and youth through better access to markets, services and livelihood opportunities.
- **Access to Basic Services:** Access to education, healthcare, water supply, electricity and communication services is available but remains limited compared to urban centers. Poor road conditions can constrain access to healthcare, education, markets and emergency services, particularly during periods of difficult road conditions.
- **Gender-Based Violence (GBV):** No significant GBV concerns were identified during stakeholder consultations. Nevertheless, the project will implement awareness measures, a Workers' Code of Conduct, SEA/SH prevention measures, and an accessible Grievance Mechanism (GM) in accordance with World Bank requirements.
- **Cultural Heritage:** No known cultural heritage sites, archaeological resources or culturally significant locations were identified within the project area. A Chance Finds Procedure will be included in the Contractor's ESMP and applied during excavation and earthworks.
- **Security:** The security situation in Galgala Village is generally stable. Project activities will be coordinated with local authorities, community leaders and relevant institutions to ensure safe implementation.
- **Community Health and Safety:** The project is expected to generate positive social benefits through improved road accessibility, reduced travel and transportation constraints, improved movement of agricultural produce, and better access to markets and essential services. Potential community health and safety risks associated with construction vehicles and machinery, dust, noise, open work areas and interaction between workers and communities will be managed through traffic management, warning signs, controlled access to active work areas, community awareness and appropriate site safety measures.
- **Grievance Mechanism:** The S-FSRP Grievance Mechanism (GM), including Hotline 3060, is available to all stakeholders to submit complaints, concerns or feedback related to project activities.

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4.5 Physical and Biophysical Environment

Topography and Soil

The project area is characterized by hilly and rugged terrain with exposed rock and steep sections along the existing feeder road. The road generally descends through the project area, with some sections experiencing relatively steep gradients. Existing road conditions include erosion, potholes, localized washouts and loss of gravel material caused by surface runoff.

Geotechnical investigations undertaken for the road rehabilitation indicate that the existing soil/material conditions are generally suitable for road subgrade purposes, subject to appropriate compaction and moisture control.

Water Supply System

The project area contains natural drainage pathways and seasonal surface runoff that cross or flow alongside sections of the existing road. The rehabilitation works will not involve development of a water supply system; however, construction activities will be managed to prevent contamination or obstruction of natural drainage pathways and nearby water resources.

Climate

Galgala Village experiences a semi-arid climate similar to the wider Bosaso area, characterized by:

- Two rainy seasons: *Gu* (rainy season) (April–June) and *Deyr* (rainy season) (October–December)
- Two dry seasons: *Jilaal* (January–March) and *Hagaa* (July–September)
- High temperatures ranging between 20°C and 36°C
- Variable and erratic rainfall that influences agricultural production and water availability.

These climatic conditions underscore the importance of efficient irrigation infrastructure and sustainable water resource management.

Hydrology and Drainage

Surface runoff is an important consideration along the Galgala Feeder Road. Sections of the existing road are affected by runoff from the surrounding hillsides, resulting in erosion, gravel loss, potholes and recurrent washouts. In particular, the initial section of the road is affected by recurrent washouts, while hillside runoff affects other sections of the alignment.

The rehabilitation design therefore incorporates drainage improvements, including approximately 400 m of concrete Irish crossing and 100 m of concrete V-shaped side drain,

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together with rehabilitation of existing crossings. These measures are intended to safely convey runoff, reduce erosion and washout risks, and protect the rehabilitated road.

Wildlife

The project area is predominantly rural and agricultural, with the road passing through disturbed areas already used for community access and agricultural activities. No significant critical habitats, protected areas or wildlife migration routes were identified within the project footprint during the environmental and social screening. Minor localized vegetation disturbance may occur during road rehabilitation, realignment and drainage works and will be minimized through appropriate construction controls and reinstatement of disturbed areas where necessary.

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5. Evaluation of Environmental and Social Impacts

5.1 Introduction

This section evaluates the potential environmental and social impacts associated with the implementation of the Rehabilitation of Galgala Feeder Road during the construction/rehabilitation and operation and maintenance phases. The assessment considers the project's physical setting, socio-economic context, road rehabilitation activities, and sensitivities identified during field observations and community consultations.

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

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

The risk rating applied in this chapter is consistent with the cleared E&S screening (Annex 10.2), which classified the subproject as Moderate Risk overall, with individual inherent risks rated Medium to Low in Table 2 and residual risks expected to be Low following implementation of the mitigation measures in Table 3. Risks identified through “Yes” responses in the screening including earthworks and erosion, dust and air quality, solid and hazardous waste, construction traffic and road safety, OHS, SEA/SH, minor vegetation clearance, and chance finds are carried forward into Table 3 with corresponding mitigation, monitoring and implementation responsibilities

5.2 Positive Impacts

The implementation of the Galgala Feeder Road Rehabilitation will generate important environmental, social and economic benefits, including:

a. Improved Road Accessibility and Connectivity

- Improved road conditions and year-round accessibility for local communities, farmers and other road users
- Improved connectivity between agricultural production areas, markets and essential services
- Reduced travel difficulties associated with erosion, potholes, washouts and poor road conditions.

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b. Improved Market Access for Agricultural Production

- Improved ability of farmers to transport agricultural produce to markets
- Improved access to agricultural inputs and other goods and services
- Reduced crop losses and spoilage associated with difficult and delayed transportation.

c. Strengthened Community Resilience

- Improved reliability of road access during periods of rainfall and surface runoff
- Improved access to healthcare, education, markets and emergency services
- Enhanced resilience of local communities through improved transport connectivity.

d. Economic Benefits for Households

- Reduced transportation time and costs for farmers and other road users
- Improved opportunities for agricultural trade and local economic activities
- Improved access to markets and livelihood opportunities for surrounding communities.

e. Employment Opportunities

- Creation of short-term employment opportunities for local community members during road rehabilitation and construction works
- Increased participation of local labor in project implementation activities, particularly for suitable unskilled and semi-skilled positions.

f. Improved Road Safety and Infrastructure

- Improved road surface conditions through grading, pothole repair and rehabilitation of damaged sections
- Improved crossing conditions through construction and rehabilitation of concrete Irish crossings
- Improved drainage and road protection through construction of the V-shaped concrete drain and associated erosion-control measures.

g. Environmental Benefits

- Reduced road erosion and recurrent washout through improved drainage and runoff management
- Reduced uncontrolled concentration of surface runoff along vulnerable road sections;
- Improved stability and durability of rehabilitated road sections
- Reduced need for frequent repairs associated with erosion, potholes and drainage-related road deterioration.

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

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

Table 2: Negative Environmental and Social Impacts, Risk Assessment and Mitigation Measures in Galgala Feeder Road Rehabilitation

Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
Earthworks and Soil Disturbance	Excavation, grading and road formation may disturb soil, expose surfaces to erosion and generate excess excavated material.	Road grading, realignment, excavation, drainage and crossing construction.	Implementation	ESS1; ESS3	Soil, roadside areas, agricultural land	Medium	Low
Soil Erosion and Runoff	Disturbed road surfaces and slopes may be susceptible to erosion, particularly during rainfall	Earthworks, steep terrain, concentrated runoff and exposed soil.	Implementation	ESS1; ESS3	Road corridor, soils, drainage pathways and adjacent land	Medium	Low
Dust Emissions	Dust generated from earthworks, grading, excavation,	Dry road surfaces, earthworks, material transportation and	Implementation	ESS3; ESS4	Workers, nearby communities, farmers and road users	Medium	Low

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Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
	material hauling and vehicle movements may affect workers and nearby communities.	construction traffic.					
Noise and Vibration	Construction machinery and vehicles may generate temporary noise and vibration affecting nearby residents and road users.	Graders, excavators, compactors, trucks, concrete works and other equipment.	Implementation	ESS3;ESS4	Workers and nearby communities	Medium	Low
Labour Disputes (Payment, Overtime, Working Conditions)	Disputes related to payment, overtime, and working conditions may disrupt works.	Delays in payment, unclear contracts, or poor conditions may cause worker grievances.	Implementation	ESS2	Project workers	Medium	Low
Occupational Health & Safety (OHS) Risks	Workers may be exposed to injuries from machinery, vehicles, excavation, concrete works, manual handling, steep terrain, dust, noise	Road construction activities and operation of vehicles, machinery and tools.	Implementation	ESS2	Workers	Medium	Low

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Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
	and heat stress.						
Community Health & Safety Risks	Open excavations, active machinery, construction materials and unfinished structures may create risks to community members.	Uncontrolled access to active road construction areas.	Implementation	ESS4	Community members, particularly children and vulnerable road users	Medium	Low
Potential SEA/SH Risks	Worker-community interaction may create SEA/SH risks if appropriate preventive measures are not implemented.	Presence of construction workers and interaction with local communities.	Implementation	ESS2; ESS10	Community members, particularly women and girls	Low	Low
Construction Traffic and Road Safety	vehicles and machinery may create collision and accident risks for pedestrians, farmers and other road user	Movement of trucks, construction machinery and material-hauling vehicles along an active community road.	Implementation	ESS4	Community members, pedestrians, drivers and other road users	Medium	Low
Pollution: Solid Waste	Cement-bags, food waste, and packaging generate site waste.	Project activities produce non-organic and organic waste with no	Implementation	ESS3	Site environment, soil, community health	Low	Low

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Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
		designated disposal plan.					
Pollution: Fuel/Oil Spills	Accidental spills from vehicles, machinery or fuel storage may contaminate soil and drainage pathways.	Refueling, equipment maintenance and improper storage or handling of fuel and lubricants.	Implementation	ESS3	Soil, surface runoff and drainage pathways	Low	Low
Chance Finds / Cultural Heritage	Excavation and earthworks may accidentally uncover archaeological or culturally significant materials.	Road excavation, drainage works and other earth-disturbing activities.	Implementation	ESS8	Potential cultural heritage resources	Low	Low

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6. Environmental and Social Management Plan (ESMP)

6.1 Overview of Key Environmental and Social Risks and Impacts

The implementation of the Rehabilitation of Galgala Feeder Road will generate a range of environmental and social risks requiring careful management. Key risks include soil disturbance and erosion from earthworks and grading; dust and noise emissions; construction and solid waste; alteration or obstruction of natural drainage; sedimentation; vegetation disturbance; occupational health and safety (OHS) risks; community health and road safety risks; temporary disruption of access; and increased construction traffic associated with the movement of machinery, vehicles and construction materials.

Additional risks identified through the Chapter 5 assessment include impacts associated with material sourcing and haulage, accidental fuel and oil spills, concrete works, temporary obstruction of road access, labor and working conditions, worker-community interactions, SEA/SH risks, and accidental chance finds during excavation and other earth-disturbing activities.

No armed security personnel will be used on this project, which reduces ESS4 security risks. Access to active construction areas will be controlled through appropriate barriers, warning signs, traffic management measures and coordination with local communities and authorities.The rehabilitation works will involve conventional road construction materials and equipment, including gravel, aggregates, cement/concrete, fuels and lubricants. These materials will be stored, handled and managed in accordance with appropriate environmental, health and safety measures to prevent spills, pollution and community exposure.

These risks are generally predictable, site-specific and manageable through the mitigation measures outlined in this ESMP. Positive impacts include improved road accessibility and connectivity, improved farmers' access to markets, reduced transportation time and costs, reduced crop losses during transportation, improved access to essential services, improved drainage and erosion control, strengthened agricultural livelihoods, and short-term employment opportunities for local communities.

6.2 Mitigation and Monitoring Plan

The following Table presents the consolidated ESMP for the Rehabilitation of Galgala Feeder Road. It incorporates the environmental and social risks identified in Chapter 5, including earthworks and soil disturbance, erosion and runoff, dust and noise, construction waste, fuel and oil spills, material sourcing, vegetation disturbance, drainage impacts, occupational health and safety, construction traffic and road safety, temporary access disruption, community health and safety, labor management, SEA/SH risks, chance finds, and post-construction road safety and maintenance.

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Table 3: ESMP Mitigation and Monitoring Plan – Rehabilitation of Galgala feeder road

ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
ESS1 Assessment and Management of Environmental and Social Risks and Impacts								
ESS1	Failure to properly assess and manage E&S risks of the road works; inadequate contractor E&S capacity; C-ESMP not prepared or not implemented	Disclose and implement this ESMP for all road rehabilitation works; assess contractor E&S capacity before mobilization; require an approved Contractor's ESMP (C-ESMP) covering OHS, traffic, waste, erosion/drainage and SEA/SH before works commence; assign a qualified E&S/OHS focal person within the contractor's team; include ESMP obligations in the works contract; conduct induction and periodic capacity-building for site staff.	Review of approved C-ESMP and contractor E&S staffing; contract review; induction/training records; periodic compliance assessment reports.	Pre-mobilization; monthly during construction	Contractor / SE / SPCU	C-ESMP approved before mobilization; qualified E&S focal person on site; ESMP clauses in contract; training records maintained.	Monthly E&S site report by Contractor to Supervising Engineer (SE) and SPCU.	1,000
ESS1	Weak monitoring, reporting and corrective-action follow-up, including limited supervision of a remote hillside site.	Establish an E&S monitoring and reporting schedule (site inspections, non-compliance register, corrective action tracking); SE to verify implementation of each mitigation measure; SPCU safeguards team to conduct periodic supervision missions; report incidents within 24 hours and close out non-compliances within agreed timelines.	Site inspection checklists; non-compliance and corrective action register; supervision mission reports.	Weekly (SE); monthly/quarterly (SPCU)	SE / SPCU	Monitoring checklists completed; all non-compliances closed within agreed timeframe; supervision reports submitted.	Monthly E&S report by SPCU to MoAI/S-FSRP and the World Bank.	600
ESS2 Labour and Working Conditions								

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
ESS2	Child and forced labour: engagement of workers below the minimum age (18 years) or under coercive conditions (screening: Yes).	Verify the age of all workers before hiring using official identification; maintain a worker registry with age verification records; prohibit child and forced labour both are grounds for immediate dismissal and contract sanction; issue written contracts specifying terms, wages, hours and grievance rights; display the minimum age requirement visibly at site.	Review of worker registry and contracts; random spot checks of worker ID; worker interviews.	Pre-works; monthly spot checks	Contractor / SE / SPCU	Worker registry complete with verified ages; no workers under 18 on site; all workers hold signed contracts.	Monthly labour compliance report by Contractor to SE and SPCU.	200
ESS2	Absence of employment contracts; unfair or unprocedural dismissal; disputes over wages, daily rates and delayed payment.	Inform all workers of employment terms before starting; issue written contracts (including for casual/daily-paid labour); comply with applicable labour law on wages and working hours; pay daily/casual workers on the agreed cycle; prohibit discrimination on grounds of gender, clan, age or disability; resolve pay disputes within 7 days.	Review of signed contracts and payment records; worker complaint log; interview sample of workers.	Pre-works; monthly	Contractor / SE	All workers hold signed contracts; payment records complete; no unresolved pay or dismissal disputes.	Monthly labour compliance report by Contractor to SE and SPCU.	200
ESS2	Poor working conditions: excessive hours, discrimination, and absence of a functioning Workers' Grievance Mechanism	Establish a workers' GM separate from the community GM, with a named focal person and clear escalation path; post workers' GM contact details at site and at the worker assembly point; comply with labour law on working hours and rest days; provide shaded rest area, drinking water and sanitation facilities at site; prohibit discrimination and retaliation.	Verify workers' GM posted and functional; review workers' GM log; interview sample of workers on awareness of the GM.	Monthly	Contractor / SE	Workers' GM operational and known to workers; welfare facilities in place; no unresolved discrimination complaints.	Monthly labour compliance report by Contractor to SE and SPCU.	200

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
ESS2	OHS risks during road works: injuries from excavation, grading and compaction plant, haulage vehicles, concrete and reinforcement works, manual handling, work on steep and rock-outcropped terrain, falling rock, dust, noise, heat stress and fatigue	Prepare and implement a site OHS plan as part of the C-ESMP; provide and enforce PPE (helmet, safety boots, high-visibility vest, gloves, eye and hearing protection, dust masks); induct all workers and hold weekly toolbox talks; separate plant movement from workers on foot and use a trained banksman during reversing/tipping; batter, bench or support excavations and restrict access to open cuts; secure loose rock and unstable slopes before working below them; provide drinking water (min. 3 litres/worker/day), shaded rest and a 30-minute break every 2 hours during peak heat (10:00–15:00); maintain a stocked first-aid kit, trained first-aider and documented emergency/evacuation and medical referral arrangements; keep an incident and near-miss register.	Daily site inspection; PPE spot checks; incident and near-miss log review; toolbox talk attendance register; plant and equipment inspection records.	Daily; incidents reported within 24 hours	Contractor / SE	PPE in use by 100% of workers on site; weekly toolbox talks held; zero lost-time injuries; first-aid kit stocked; all incidents recorded and investigated.	Daily site log; monthly OHS report to SE and SPCU; incidents reported to SE and SPCU within 24 hours.	3,000
ESS3 Resource Efficiency and Pollution Prevention and Management								
ESS3	Dust emissions and air pollution from earthworks, grading, gravel handling, material haulage and vehicle movement on the dry gravel road, affecting workers, roadside	Apply water spraying to active work areas, haul routes and stockpiles during dry and windy conditions; limit vehicle speed to 20 km/h on the feeder road and through settled areas; cover haulage trucks carrying gravel, sand and fine	Visual observation at site boundary and along haul route; water bowser/spraying records; speed and truck-cover checks; community	Daily during construction	Contractor / SE	Water spraying records maintained; no visible dust plumes at receptors; trucks covered; no unresolved dust complaints.	Daily site log; dust complaints recorded in the GM log and reported weekly to SE.	1,800

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	households, farms and road users	material; locate stockpiles away from houses and farms; schedule heavy material movement outside peak wind hours; suspend dusty activities where dust is visibly affecting households and after complaints; provide dust masks to exposed workers; maintain plant in good condition to limit exhaust emissions.	complaint log review.					
ESS3	Noise and vibration from graders, excavators, compactors, rock breaking, trucks and concrete works affecting nearby residents, livestock and road users	Restrict works to daytime hours (08:00–17:00) and prohibit night work near settlements; give advance notice to the community of noisy activities and their duration; fit and maintain silencers/mufflers on all plant; switch off idle equipment; avoid simultaneous noisy operations close to houses; provide hearing protection to workers exposed to high noise levels.	Verification of working hours; plant maintenance records; community complaint log review.	Daily during construction	Contractor / SE	Works consistently within 08:00–17:00; plant silencers fitted; no unresolved noise complaints.	Daily site log; noise complaints recorded in the GM log and reported weekly to SE.	100
ESS3	Solid waste and construction debris: excavated spoil, broken concrete and rubble from rehabilitation of existing crossings, cement bags, reinforcement offcuts, packaging and workforce food waste	Provide labelled waste receptacles at the site and workers' area; segregate organic, inert and recyclable waste; remove rubble and debris from the carriageway, shoulders and drainage lines promptly so they do not obstruct road users; dispose of non-organic waste only at the disposal site approved by Bosaso District Administration; reuse suitable inert material as fill where the design permits;	Weekly site inspection checklist; waste log and disposal receipts review; visual check of corridor and drainage lines; handover inspection.	Weekly; at handover	Contractor / SE / SPCU	Waste receptacles in use; waste log maintained; no burning or dumping observed; corridor and drains clear of debris at handover.	Weekly E&S site report to SE; disposal records submitted to SPCU.	600

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		prohibit open burning and dumping in wadis, drainage lines or on farmland; maintain a daily waste log; leave the site clean at handover.						
ESS3	Hazardous waste and accidental spills: used oils, filters, lubricants, bitumen products, fuel and chemical additives from plant operation, refuelling and maintenance contaminating soil and drainage pathways	Designate a bunded refuelling and maintenance area at least 50 m from watercourses, drainage lines and wells and on an impermeable surface; store fuel, oils and chemicals in sealed, labelled containers under cover; prohibit refuelling or servicing plant within the drainage corridor; maintain a spill kit on site and train operators in its use; collect used oils, filters and contaminated soil in sealed containers and hand them to an approved handler/facility; prohibit burial, burning or discharge of oils; clean up and report any spill immediately.	Weekly inspection of storage, bunding and refuelling area; visual check for oil stains; spill kit inventory; hazardous waste disposal records.	Weekly; spills reported immediately	Contractor / SE / SPCU	Fuel/oil stored in bunded area >50 m from drainage; spill kit present and stocked; disposal records for used oils; zero uncontained spills.	Weekly E&S site report; spill incidents reported to SE and SPCU within 24 hours.	600
ESS3	Material sourcing and haulage: uncontrolled extraction of gravel, sand and stone and unrehabilitated borrow areas causing land degradation, erosion and community complaints.	Source gravel, aggregate and water only from sites approved by the SE, the district administration and the landowner/community, with prior consent documented; avoid extraction from active watercourses, farmland and areas close to houses; limit excavation depth and slope, and reshape, re-profile and rehabilitate borrow areas on completion; agree haul routes and timing with the	Review of borrow site approvals and consent records; inspection of borrow areas during use and after rehabilitation; haul route inspection.	Before extraction; monthly; at closure	Contractor / SE / District Administration	Written approvals for all borrow/quarry and water sources; borrow areas reshaped and rehabilitated before handover; no community complaints on material sourcing.	Monthly E&S site report to SE and SPCU; borrow area closure report at handover.	300

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		community; keep haul roads watered and in safe condition.						
ESS4 Community Health and Safety								
ESS4	Community exposure to physical hazards from open excavations, active plant, stockpiled materials, fresh concrete and unfinished Irish crossings and drains along a road used daily by residents, children	Demarcate and barricade all active work areas, excavations and fresh concrete works with tape, barriers and warning signs in Somali and English; provide safe pedestrian bypass routes; backfill or cover excavations at the end of each working day or secure them overnight; store materials off the carriageway and clear of houses and farm access; prohibit community access to the working area and secure plant and keys when not in use; hold community safety awareness sessions, including with schools and women's groups.	Daily site inspection of barriers, signage and excavations; community awareness attendance records; GM log review.	Daily; awareness sessions at start and mid-point of works	Contractor / SE	All excavations barricaded or backfilled daily; signage in place; awareness sessions held; zero community injuries.	Daily site log; incidents reported to SE and SPCU within 24 hours.	600
ESS4	Construction traffic and road safety: movement of trucks, graders, rollers and material-haulage vehicles along an active 2.5 km community feeder road shared with pedestrians, farmers, livestock and light vehicles.	Prepare and implement a Traffic Management Plan as part of the C-ESMP; limit speed to 20 km/h along the corridor and 10 km/h past houses, schools and at active work fronts; erect advance warning, diversion and speed signs at both ends of the works and at each active section; deploy trained flagmen during haulage, grading and concrete delivery; use only roadworthy vehicles and licensed, inducted drivers; prohibit overloading	Traffic Management Plan review; daily signage and flagman check; speed monitoring; vehicle roadworthiness and driver licence verification; incident log review.	Daily during construction	Contractor / SE	Traffic Management Plan implemented; signs and flagmen in place at all active fronts; all drivers licensed and vehicles roadworthy; zero traffic incidents involving community members.	Weekly E&S site report; road safety incidents reported to SE and SPCU within 24 hours.	1,200

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		and driving outside daylight hours; agree haulage timing with the community to avoid market and school peak times.						
ESS4	Temporary disruption of community, farm and market access during works on the only feeder road, including at the 400 m Irish crossing and 375 m realignment sections.	Maintain at least one passable lane or a safe temporary bypass/diversion at all times; programme works in sections to avoid full closure of the corridor; notify the community, VDC and district administration at least 7 days before any closure or diversion, stating duration and alternative routes; limit full closure of any section to the minimum necessary and avoid market days; maintain access to farms, houses and water points; reinstate any access route damaged by the works.	Verification of bypass/diversion availability; advance notice records; GM log review for access complaints; farm access inspection.	Daily during works; notices at least 7 days before closures	Contractor / SE / District Administration	Access maintained or bypass provided at all times; advance notices issued; no unresolved access complaints; damaged access routes reinstated.	Weekly E&S site report; access complaints recorded in the GM log.	300
ESS4	SEA/SH and worker misconduct arising from interaction between the workforce (including 4 non-local staff) and the community	All workers sign the Workers' Code of Conduct (CoC) before starting work and receive induction in the local language; the CoC prohibits SEA/SH, relations with minors, exchange of favours for sex, harassment and discrimination, with immediate dismissal as a sanction; maximize local recruitment to minimize labour influx; hold monthly SEA/SH awareness sessions for workers and separate sessions for the community, including women and girls; operate a confidential, survivor-	Review of signed CoC records; induction and awareness attendance registers; GM log review for SEA/SH cases; spot interviews with women's representatives.	CoC signing pre-works; awareness monthly; GM continuous	Contractor / SE / SPCU (GBV focal point)	100% of workers signed the CoC before starting work; monthly awareness sessions held; confidential pathway operational and known to the community; SEA/SH cases referred within 24 hours.	Monthly safeguards report to SE and SPCU; SEA/SH incidents reported within 24 hours through the confidential pathway.	1,000

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		centred GM pathway that requires no written evidence, involves no mediation with the alleged perpetrator, and provides referral to GBV service providers with survivor consent; display the confidential reporting channel (S-FSRP Hotline 3060) at the site and in the community.						
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources								
ESS6	Minor, localized disturbance of vegetation (shrubs and scattered trees) during grading, realignment, drainage works and material movement	Confine all works to the designated construction footprint and existing road corridor; prohibit unnecessary vegetation clearance and the cutting of mature trees without prior approval from the SE and the district administration; prohibit charcoal burning and firewood cutting by the workforce; reinstate and, where feasible, revegetate disturbed areas outside the carriageway on completion.	Visual inspection of cleared areas against the design footprint; tree-cutting approval records; reinstatement check at handover.	Monthly; at handover	Contractor / SE	No clearance beyond the design footprint; no unauthorized tree cutting; no charcoal burning by workers; disturbed areas reinstated.	Monthly E&S site report to SE and SPCU.	200
ESS8 Cultural Heritage								
ESS8	Accidental discovery of archaeological, historical, burial or other culturally significant material during excavation for crossings, drains and realignment	Apply the project Chance Finds Procedure (Annex): on discovery, stop work immediately in the affected area, secure and demarcate the site, do not disturb or remove any find, and notify the SE, SPCU and the district administration within 24 hours; works in that area resume only after written clearance from the	Induction and toolbox talk records covering chance finds; site supervision during excavation; chance find report register.	At induction; continuous during excavation works	Contractor / SE / SPCU / District Administration	Chance Finds Procedure included in the C-ESMP and briefed to all workers; any find reported within 24 hours and cleared before resumption.	Immediate notification to SE and SPCU; recorded in the monthly E&S report.	200

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		competent authority; brief all workers and machine operators on the procedure at induction and before excavation works.						
ESS10 Stakeholder Engagement and Information Disclosure								
ESS10	Inaccessible Grievance Mechanism, insufficient stakeholder engagement and inadequate disclosure of project information during the works	Display GM information, including S-FSRP Hotline 3060, at the work site, at both ends of the corridor and at community gathering points; designate a GM focal person known to the community; provide a complaint box and accept verbal, written and anonymous complaints; hold community meetings before works, at mid-point and at handover, and give advance notice of activities affecting access, dust or noise; record all grievances in the GM register, acknowledge within 48 hours and resolve within 7–14 days; escalate unresolved cases to the District Administration and the SPCU Safeguards Team; keep the ESMP available for community review on request.	GM register review; community meeting attendance records; site inspection of GM display and complaint box.	GM continuous; meetings at start, mid-point and handover; display check monthly	SPCU / Contractor / District Administration	GM information displayed and accessible; meetings held per schedule; 100% of grievances acknowledged within 48 hours; no case unresolved beyond 14 days.	Monthly safeguards report by SPCU to MoAI/S-FSRP and the World Bank, including a GM summary.	800

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6.3 ESMP Implementation Budget

The implementation of the Environmental and Social Management Plan (ESMP) for the Rehabilitation of Galgala Feeder Road requires financial resources to support mitigation and monitoring measures during the construction and rehabilitation phase. These include occupational health and safety (OHS), traffic and community safety, dust suppression, waste management, erosion and drainage control, spill prevention and response, environmental and social monitoring, stakeholder engagement and grievance management.

The total cost for implementing ESMP measures is estimated at USD 16,500, covering key activities such as PPE provision, safety and warning signage, traffic management, dust control, waste management, community awareness, SEA/SH prevention, environmental and social monitoring, and implementation of other mitigation measures during road rehabilitation works**.**

Following completion of the rehabilitation works, environmental and social management will mainly focus on routine road safety, drainage maintenance, erosion control and periodic inspection of the rehabilitated road and associated drainage/crossing structures**.**

Sustainability of ESMP measures after project completion will be ensured through continued oversight by the relevant Puntland government authorities, including the responsible road authority and MoAI/S-FSRP as applicable. Routine maintenance will include keeping drainage structures and Irish crossings clear, addressing erosion and washout areas, and maintaining the road in a safe and serviceable condition.

6.4 Grievance Mechanism (GM)

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

Grievances may relate to implementation impacts such as dust, noise, construction traffic, temporary access restrictions, damage to property or access routes, waste management, labor issues, worker conduct, road safety or other community health and safety concerns during rehabilitation works. All complaints - verbal, written or anonymous will be received respectfully and handled without discrimination or fear of retaliation.

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

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

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

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

6.5 Minimum Contents of the Contractor's ESMP (C-ESMP)

Before mobilization and as a condition for commencement of works, the Contractor shall prepare a Contractor's Environmental and Social Management Plan (C-ESMP) for approval by the Supervising Engineer and the SPCU Safeguards Team. The C-ESMP shall translate the mitigation and monitoring measures in Table 3 into site-level plans and method statements and shall contain, at a minimum, the following:

- **Occupational Health and Safety (OHS) Plan** – task-specific risk assessments covering earthworks and excavation, crossing and concrete works, plant–traffic interface, manual handling, and work on steep and rock-outcropped terrain; PPE requirements; heat-stress management; induction and toolbox talks; first aid and emergency response; and incident/near-miss reporting and investigation.
- **Traffic Management Plan (TMP)** – signage, speed limits (20 km/h along the corridor and 10 km/h at active work fronts and near sensitive receptors), flagmen where required, haul routes and timing, pedestrian and livestock crossing arrangements, driver and vehicle requirements, and identification of sensitive receptors.

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- **Waste Management Plan** – waste types and estimated quantities, segregation and storage, reuse of suitable excavated material, approved disposal arrangements, hazardous waste management, fuel storage and refuelling, and spill prevention and response.
- **Erosion and Sediment Control Plan** – temporary and permanent controls for disturbed and steep sections, protection of natural drainage paths, scour protection at drainage/crossing outlets, spoil and stockpile management, and post-rainfall inspections.
- **Vegetation Clearing Method Statement** – areas to be cleared and retained, restriction of clearing to the road prism and safety/visibility requirements, prior MoAI/SPCU approval for removal of any mature tree, handling of cleared vegetation, and reinstatement of disturbed areas.
- **Borrow and Quarry Management Note** – confirmation that gravel and aggregates will be obtained from existing approved/licensed sources, including relevant approvals. Any proposed new material source shall be subject to prior E&S review and approval.
- **Workers' Grievance Mechanism Procedure** – channels and contact points separate from the community GM, acknowledgement and resolution arrangements, confidentiality, protection from retaliation, record keeping, and escalation to the project-level GM where necessary.
- **SEA/SH and GBV Action Plan** – Workers' Code of Conduct and signature records, induction and awareness activities, confidential survivor-centred reporting arrangements including the **S-FSRP Hotline 3060**, referral arrangements with survivor consent, and applicable disciplinary measures.
- **Chance Finds Procedure** – incorporation of the procedure in Annex 10.5 including stop-work, securing, notification and clearance requirements, and worker/plant-operator awareness during induction and before excavation works.
- **Temporary Access Management Protocol** – phasing of works, maintenance of safe/passable access or temporary bypasses where practicable, advance communication with affected road users and relevant local authorities, and reinstatement of temporary access routes affected by the works.

The Contractor shall nominate a qualified E&S/OHS focal person maintain the registers and records required under Table 3 and submit monthly E&S compliance reports to the Supervising Engineer and SPCU. No works shall commence on any section until the relevant requirements of the approved C-ESMP are in place.

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7. Compliance and Coordination

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

7.1 Institutional Roles and Responsibilities

Table 4 provides a consolidated overview of the roles and responsibilities of each institution and actor involved in ESMP compliance for the project.

Table 4: Institutional Roles and Responsibilities for ESMP Compliance

Institution / Actor	Mandate / Role	Key Responsibilities for ESMP Compliance	Coordination / Reporting Line
MoAI (Ministry of Agriculture and Irrigation)	Lead technical owner for the Rehabilitation of Galgala Feeder Road	Provides overall project oversight and ensures that environmental and social requirements are integrated into implementation of the feeder road rehabilitation; coordinates with SPCU and other relevant authorities	Coordinates with District Administration and SPCU; reports through project structures.
Galgala Village/Bosaso District Administration	Local authority; permitting and local oversight.	Confirms local approvals; supports enforcement of local bylaws (waste, sanitation, access control); supports community engagement and issue resolution; supports solid waste collection and disposal; facilitates GM activities.	Coordinates with MoAI/ and SPCU; links to local security and community leaders as needed.
SPCU / State Project Coordination Unit, MoAI (Safeguards Team)	ESF oversight for the subproject; World Bank safeguards compliance.	Ensures ESMP implementation; reviews and approves contractor C-ESMP and OHS plans; monitors compliance including labour, OHS, stakeholder engagement, and GM; consolidates E&S reports; oversees complaints logging; coordinates between ministries; supports reporting, incident management, and corrective action follow-up.	Reports to implementing agency / project management; coordinates with MoAI, Municipality, and Supervising Engineer.
Supervising Engineer (SE)	Day-to-day construction supervision.	Confirms contractor compliance with ESMP/C-ESMP; verifies OHS, waste management, traffic management, dust/noise control and community safety measures; documents non-compliances	Reports to SPCU and implementing agency; coordinates daily with

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Institution / Actor	Mandate / Role	Key Responsibilities for ESMP Compliance	Coordination / Reporting Line
		and instructs corrective actions; supervises construction quality and environmental and social compliance during road earthworks, concrete Irish crossing construction, road realignment, drainage works, grading and rehabilitation of existing crossings.	Contractor and focal points.
Contractor	Executes road rehabilitation and associated civil works.	Prepares and implements C-ESMP, OHS plan, Traffic Management Plan, waste management measures, traffic/access controls, dust/noise control, erosion and drainage controls, spill prevention measures, worker Code of Conduct, SEA/SH prevention measures and community safety actions; assigns appropriate E&S personnel; provides PPE; keeps records of training, incidents and inspections; and reports incidents promptly.	Reports to Supervising Engineer; provides monthly E&S reports; notifies incidents immediately.
Community Representatives (Elders, Women, Youth)	Community interface and feedback channel.	Supports awareness and feedback; helps identify community concerns related to road access, traffic safety, temporary disruptions, dust and noise; supports community-level issue resolution; promotes use of the GM; participates in consultations	Coordinates with Municipality/MoAI; channels issues to GM focal point for formal registration.

7.2 Coordination and Reporting Lines

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

- The SPCU Safeguards Team serves as the central E&S coordination mechanism, linking the implementing institutions, Supervising Engineer and Contractor
- MoAI/S-FSRP provides overall project coordination and technical oversight for the road rehabilitation works;
- The Supervising Engineer acts as the primary day-to-day interface between the project implementation team and the Contractor

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- The Contractor reports monthly E&S performance to the Supervising Engineer and immediately reports serious incidents in accordance with project incident-reporting procedures
- Bosaso District Administration coordinates locally with MoAI/SPCU and connects with community leaders and relevant local actors as needed; and
- Community Representatives channel concerns to the GM focal point for formal registration and resolution.

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8. Stakeholder Consultation

8.1 Introduction

Stakeholder consultation was undertaken as part of the environmental and social assessment for the Galgala Feeder Road Rehabilitation Project in Galgala, Bosaso District, Bari Region. Engaged communities in Galgala were 21 participants (10 male, 11 female) from different sectors of community. The consultation process was undertaken to ensure that farmers, community members, local authorities, and other relevant stakeholders were informed about the proposed project and provided with an opportunity to express their views, concerns, priorities, and expectations. The consultation process is consistent with World Bank ESS10: Stakeholder Engagement and Information Disclosure and emphasizes transparency, inclusiveness, meaningful participation, and continued communication with project-affected and interested stakeholders.

Consultations were conducted with community leaders, farmers, women, youth, Village Development Committee (VDC) representatives, and relevant local authorities. Stakeholder feedback identified feeder road rehabilitation priorities, environmental and social risks, mitigation measures, community participation arrangements, and the stakeholder engagement measures incorporated into this ESMP.

8.2 Objectives of the Consultation Process

Stakeholder consultations were conducted to:

- Inform stakeholders about the purpose, scope, proposed activities, and expected benefits of the **Galgala Feeder Road Rehabilitation Project**
- Promote Inclusivity: conducting community consultation meetings and stakeholder engagement plans, through local community driven design for rehabilitating main Galgala road that links to main cities
- Conduct technical engineering assessments and topography survey of the road and develop ESMP accordingly
- Seek stakeholder views on potential environmental and social risks and appropriate mitigation measures.
- Confirm community acceptance of the proposed intervention and the suitability of the existing project footprint within Galgala

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- Identify potentially vulnerable or disadvantaged groups and promote their meaningful participation in project engagement activities
- Understand farmers' priorities and concerns regarding feeder road rehabilitation, contingency plans while rehabilitating the road, accessing the market and main cities
- Build community support and ownership for implementation and subsequent operation and maintenance of the improved feeder road.
- Establish clear communication channels for information sharing, feedback and grievance handling throughout project implementation.

8.3 Stakeholders Consulted

Consultations involved a broad range of stakeholders, including:

- Community elders and traditional leaders
- Bosaso District Administration
- Women's representatives and youth groups
- Farmers, livestock owners, and water users
- Local community members from Galgala Village
- Village Development Committee (VDC)

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

8.4 Summary of Consultation Activities Conducted

Consultations included:

- A community consultation meeting involving elders, women, youth, farmers, water user association, VDC representatives, and other community representatives.
- Site visits and discussions on the condition and functionality of the existing feeder road rehabilitation and the proposed location for project improvements.
- Discussions on the main Galgala Feeder road rehabilitation and proposed improvements from engineering surveys.

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- Discussions with farmers and pastoralists about the existing challenges of the feeder road, access to market obstacles, available storage areas for crops and animal fodder, agricultural production needs, operation and maintenance arrangements, and efficient use of the road after rehabilitation.
- Discussions on potential environmental and social risks associated with construction and rehabilitation activities, including occupational and community health and safety, dust, waste, excavation, access, and worker-community interaction; and
- Awareness raising on the S-FSRP Grievance Mechanism (GM), including Hotline 3060 and its separate channels for general grievances and confidential GBV/SEA/SH-related complaints.

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

8.5 Issues Raised by the Community and Responses Provided

Table 5: Issues Raised by the Community and Responses Provided

Key Issues Raised by Stakeholders	**Responses / Actions Integrated in the ESMP**	**Stakeholder Feedback on the Project Site**	**Consultation Outcomes**
The feeder road becomes impassable during the rainy season due to landslides, erosion, and damaged road sections.	The rehabilitation design will include road grading, drainage improvements, culverts, slope stabilization, and erosion control measures to improve year-round accessibility.	The proposed activities are located within the existing main Galgala Feeder road	Strong community and stakeholder support for the Galgala feeder road rehabilitation project
Community members requested that implementation be completed before the heavy rainy season.	The Project Implementation Unit will coordinate procurement and construction scheduling to commence works as early as possible and minimize delays emphasizing timely implementation and coordination with stakeholders to avoid delays	The Galgala main feeder road rehabilitation and improvements are considered important for farmers and pastoralists to access market hub centers and main cities	Community support for the proposed feeder road rehabilitation, road grading, drainage improvements, culverts, slope stabilization and

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			erosion control improvements.
Questions on how workers will be selected	The contractor will be encouraged to prioritize qualified local workers for appropriate unskilled and semi-skilled employment opportunities, subject to transparent recruitment procedures and project labor requirements.	The community supports the project and expects timely implementation and continued consultation during construction and operation.	Commitment from community leaders, farmers, water users, and the VDC to support project implementation and coordination. site selection, and mitigation measures.
Need for grievance handling mechanism	The S-FSRP Hotline 3060 was explained to stakeholders. The hotline operates through separate channels for general project grievances and GBV/SEA/SH-related complaints. Sensitive GBV/SEA/SH cases are handled confidentially by the project GBV Officer through the dedicated channel	The proposed works are not expected to permanently restrict access to existing farmland or agricultural livelihood activities.	Increased stakeholder awareness of proposed project activities, potential environmental and social risks, mitigation measures, and the Grievance Mechanism

8.6 Overall Conclusion

Overall, stakeholders expressed strong support for the Galgala feeder road rehabilitation Project and emphasized the importance of improving the feeder road and access to market, increasing economic benefits of small-scale farmers and pastoralists, decreasing the loss of crops and livestock and easy access to the market and city centres.

This will increase agricultural productivity and crop yields, and strengthening the resilience of farming households to natural disasters. Stakeholder feedback has been incorporated into the project's environmental and social management measures, particularly in relation to community safety, local employment, farm access, operation and maintenance, grievance handling, and continued consultation. The ongoing stakeholder engagement arrangements established in this chapter will support continued community participation, transparency, and effective communication throughout project implementation, commissioning, and operation.

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9. Conclusion

The Environmental and Social Management Plan (ESMP) for the Rehabilitation of Galgala Feeder Road in Bosaso District, Bari Region provides the framework for managing environmental and social risks associated with the proposed road rehabilitation works. The assessment confirms that the subproject is Moderate Risk, with impacts that are largely predictable, localized, temporary and manageable through the mitigation and monitoring measures established in this ESMP.

The proposed rehabilitation includes approximately 400 m of reinforced concrete Irish crossing, 375 m of gravel road realignment, 100 m of concrete V-shaped side drain, rehabilitation of existing crossings, and general grading, pothole repair and shoulder reinstatement. Key environmental and social risks include earthworks and soil disturbance, erosion and runoff, dust and noise, construction waste, fuel and oil spills, localized vegetation disturbance, material sourcing, occupational health and safety, construction traffic and road safety, temporary access disruption, labor and working conditions, SEA/SH risks and community health and safety.

The Galgala Feeder Road is an existing public road/right-of-way and Bosaso Local Government has confirmed that the road corridor is public land/public infrastructure. The rehabilitation works will be implemented within the confirmed public road corridor/ROW. Accordingly, no private land acquisition, voluntary land donation, physical displacement or economic displacement is anticipated.

Stakeholder consultations demonstrated strong community support for the feeder road rehabilitation. Community members emphasized the importance of improved access to markets and services, reduced transportation difficulties and crop losses, timely implementation, local employment opportunities, road safety, continued community consultation and an accessible grievance mechanism. The S-FSRP Grievance Mechanism, including Hotline 3060, will remain operational throughout implementation.

Effective implementation of the ESMP will require coordinated action by MoAI/S-FSRP, the SPCU Safeguards Team, relevant road authorities, Bosaso District Administration, the Supervising Engineer, the Contractor and community representatives. The Contractor will be required to implement the approved C-ESMP and associated OHS, traffic and community safety measures, while the Supervising Engineer and SPCU will monitor compliance and ensure timely corrective actions. An estimated USD 16,500 has been allocated for ESMP implementation and monitoring.

Overall, the ESMP confirms that the Rehabilitation of Galgala Feeder Road can proceed with manageable environmental and social risks, provided that the prescribed mitigation, monitoring, reporting and stakeholder engagement measures are fully implemented. The rehabilitation is expected to improve road accessibility and connectivity, reduce transportation time and costs, reduce crop losses, improve farmers' access to markets and essential services, strengthen local

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livelihoods, and improve the resilience and safety of the road through better drainage and erosion control.

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10. Annexes

10.1. Stakeholder Consultation meetings' participant lists

DAWLADA PUNTLAND
EE SOOMAALIYA

PUNTLAND STATE
OF SOMALIA

Ministry of Agriculture and Irrigation
Wasaaradda Beeraha iyo Waraabka
Project Coordination Unit

Somalia Food Systems
Resilience Project
"P177816"

FSRP FSRP

A. ATTENDANCE SHEET

Community Meeting: Galgala Community meeting (Feeder road).

Location: Galgala Date: _____

#	Name	Gender	Position	Mobile No.	Signature
1	Maxamed Cawil Xasan	Male	Chief of galgala	[redacted]	
2	Xasan elmi guxa.	Male	Community		
3	Cigaadir Cumar Sieud	Male	Community		
4	Jaamac Maxamed Aadan	Male	Community		
5	Yaasiin Xaaji Maxamed	Male	Community		
6	aamino sacid Maxamed	female	Community		
7	Ahmed Cismaan Cuse	male	Community		
8	C/shakuur sacid maxamed	male	Community		

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#	Name	Gender	Position	Mobile No.	Signature
	Faadumo Axmed Warsame	Female	Community	[redacted]	
9	Jimco Salaad Maxamed	female	Community		
10	Cise Axmed gurxam	male	Community		
11	Maymuna Cismaan Cise	female	Community		
12	faadumo Ibraahim c/rahman F		Community		
13	amiino c/rahman Hassan	Female	Community		
14	Canab Ismail Sandheye	Female	Community/GBV		Canab
15	Samsam Maxamed Cali	female	Community		
16	Khadra Xasan Muse	female	Community		
17	faadumo Cabdi Cali	female	Community		
18	Khadra Maxamed Yusuf	Female	Community		
19	Bilaal Jama Cali	male	Community		
20	Ahmed Maxamed Cabdi	male	Community		
21					
22					
23					
24					

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10.2 ES Screening Checklist

10.2 ES Screening Checklist The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the **Exclusion List** in Table 5 of the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

Subproject Title	Rehabilitation of Galgala Feeder Road
Subproject Location	Galgala, Bosaso District, Bari Region, Puntland State of Somalia
Regional Unit in Charge	Puntland Ministry of Agriculture and Irrigation (MoAI) – S-FSRP State Project Coordination Unit (SPCU)
Estimated Cost	N/A (not stated at screening; to be confirmed from the approved BoQ)
Start/Completion Date	Estimated duration: 4 months (start and completion dates to be confirmed)
Brief Description of Subproject	FSRP Sub-component 3.2: Market Infrastructure and Enterprise Development – Activity 3.2.5. Rehabilitation project; land tenure: Government/Public. The sub-project involves the rehabilitation of approximately 2.5 km (2.471 km design chainage) of the existing Galgala Feeder Road in Bosaso District, Bari Region. The road is a rough gravel track through hilly, rock-outcropped terrain affected by erosion, potholes and washouts, which constrain farmers' access to markets and the transportation of agricultural produce. The rehabilitation aims to improve farmers' access to markets, reduce transportation constraints and crop losses, and improve connectivity to agricultural production areas. Main works: (i) construction of approximately 400 m reinforced concrete Irish crossing; (ii) 375 m gravel road realignment; (iii) construction of 100 m concrete V-shaped side drain; (iv) rehabilitation of existing Irish crossings; and (v) general grading, pothole repair and shoulder reinstatement along the remaining road sections. Potential E&S interactions include earthworks, material sourcing, dust and noise, construction traffic, OHS and community safety, and waste generation. The works remain within the existing public road corridor/right-of-way confirmed by Bosaso Local Government. Screening risk classification: **Moderate**.

2. Environmental and Social Screening Questionnaires

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Questions	Answer		Next Steps
	Yes	No	
ESS1			
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?		**X**	If "Yes": Exclude from project.
2. Does the subproject involve new construction or significant expansion of ponds, solid waste management systems, shelters, roads (including access roads), community centers, schools, bridges and jetties?	**X**		If "Yes": 1. Prepare a site-specific E&S Assessment and/or ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
3. Does the subproject involve renovation or rehabilitation of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters?		**X**	If "Yes": 1. Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the questions below raises specific environmental risks and requires a site-specific ESMP). 2. Include E&S risk management measures in bidding documents.
4. Will construction or renovation works require new borrow pits or quarries to be opened? ***Remark:*** gravel will be sourced from existing licensed/approved quarries no new borrow pits or quarries will be opened.	**X**		If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
5. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable.[1]		**X**	If "Yes": Apply relevant measures described in the ESMF and SEP.

[1] "Disadvantaged or vulnerable" refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

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ESS2			
6. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?		**X**	If "Yes": Exclude from project.
7. Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers? ***Remark*** :Yes – about 35 workers at peak: 12 skilled, 19 unskilled and 4 engineers/site management. About 24 will be recruited from the Galgala community (unskilled/semi-skilled); 7 skilled and 4 engineers will come from Bosaso which same district. Workers will commute daily; no labour camp is planned.	**X**		If "Yes": Apply LMP in Annex 4.
8. Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and EHSGs? Do workers need PPE relative to the potential risks and hazards associated with their work? ***Remark:*** Yes – hazards include excavation and earthworks, operation of graders, rollers, excavators and haul trucks (plant–worker and traffic interface), concrete and reinforcement works on the Irish crossings, work at excavation, manual handling, dust, noise . PPE is required. The C-ESMP must include a Contractor OHS Plan with task-specific risk assessments and a Workers' GM separate from the community GM.	**X**		If "Yes": Apply LMP in Annex 4.
9. Is there a risk that women may be underpaid when compared to men when working on the project construction? ***Remark:*** No – wages will be set by task and skill, not gender and equal pay for equal work will be written into all contracts under the LMP. Women's participation in heavy construction is expected to be limited (traditionally male-dominated) so women will be encouraged into suitable roles (e.g. water provision, catering, flagging, record keeping).		**X**	If "Yes": Apply LMP in Annex 4.
ESS3			
10. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities? ***Remark:*** Yes expected waste: (i) excavated spoil and surplus cut from the 375 m realignment and crossing foundations (moderate volume, largely reusable as fill) (ii) concrete waste and washout from the Irish crossing and side drain and	**X**		If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.

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broken concrete from rehabilitated crossings (small volume) (iii) cement bags, packaging and workforce food waste (small volume) (iv) minor hazardous waste used oils, filters, Liquid waste is limited to concrete washout and workforce sanitation. The Contractor will prepare a Waste Management Plan within the C-ESMP.			
11. Do any of the construction works involve the removal of asbestos or other hazardous materials?		**X**	If "Yes": Apply asbestos guidance provide in the ESCOP
12. Are works likely to cause significant negative impacts to air and / or water quality? **Remark**: Yes (temporary) – dust from earthworks, grading and haulage along the feeder road may temporarily affect air quality, road users and workers.	**X**		If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
13. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts? **Remark:** Existing drainage conditions contribute to erosion and washouts and will therefore be improved through construction of a new 400 m Irish crossing and 100 m V-shaped side drain, together with rehabilitation of existing crossings. These improvements are designed to safely convey surface runoff and reduce erosion and washout risks along the road		**X**	If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
14. Is there any potential to have impact on soil or water bodies due to agro-chemicals (e.g., pesticides) used in farmlands due to the consequences of the subproject activities (e.g., development of irrigation system, agriculture related activities, seed and fertilizer assistance, procurement of pesticides)? **Remark:** road works only the subproject does not use or promote agro-chemicals.		**X**	If "Yes": Apply Fertilizer and Pest Management Plan in Annex 7.
ESS4			
15. Is there a risk of increased community exposure to communicable disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents? **Remark:** Yes – Road users, nearby communities, farmers and workers may be exposed to traffic accidents and dust. Communicable disease risk is low due to the mainly local workforce. Traffic safety and dust-control measures will be implemented.	**X**		If "Yes": Apply LMP in Annex 4 and relevant measures in SEP.

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16. Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?) **Remark:** Yes (low-level) – only about few non-local staff (skilled,engineers/site management) about majority workers are from Galgala and will commute daily. Non-local staff may use local shops, lodging and water points no significant pressure on community services is expected.	**X**		If "Yes": Apply LMP in Annex 4.
17. Is there a risk that SEA/SH may increase as a result of project works?	**X**		If "Yes": Apply LMP in Annex 4.
18. Would any public facilities, such as schools, health clinic, church be negatively affected by construction? **Remark:** No – the feeder road is outside the main Galgala Village public facility area and no schools, health facilities or mosques are located directly along the road alignment		**X**	If "Yes": Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP).
19. Will the subproject require the government to retain workers to provide security to safeguard the subproject?		**X**	If "Yes": Prepare a site-specific ESMP for the proposed subproject, including an assessment of potential risks and mitigation measures of using security personnel.
ESS5			
20. Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)?[2] **Remark:** No – the Galgala Feeder Road is an existing public road/ROW confirmed by Bosaso Local Government as public land free from ownership disputes. All worksremain within the confirmed public corridor.		**X**	If "Yes": Refer to and apply the project Resettlement Framework (RF). **The land is owned by Government**
21. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)? **Remark:** No – there are no houses, structures or other assets within the works footprint no one will be relocated.		**X**	If "Yes": Refer to and apply the project RF.

[2] Environmental and Social Standard 5, Footnote 10: "In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached."

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22. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)? ***Remark: No –*** the existing public ROW is confirmed by Bosaso Local Government with no structures, businesses, seasonal vendors or other economic activities within the works footprint and sides. Access to farms will be maintained through phased works and temporary diversions where required.		**X**	If "Yes": Refer to and apply the project RF.
23. Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject? ***Remark:*** No – the land was not acquired through eminent domain it has long been an existing public road.		**X**	If "Yes": Refer to and apply the project RF.
24. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land? ***Remark:*** No – no associated facilities requiring land; construction materials come from existing licensed sources and no new access roads or power lines are needed.		**X**	If "Yes": Refer to and apply the project RF.
25. Is private land required for the subproject activity being voluntarily donated to the project?[3] ***Remark:*** No – no private land is required and no voluntary land donation is involved.		**X**	If "Yes": Refer to and apply the project RF.
ESS6			
26. Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats[4] whether directly or indirectly, or which would lead to adverse impacts on natural habitats[5]?		**X**	If "Yes": Exclude from project.

[3] Environmental and Social Standard 5, Footnote 10: "In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached."

[4] Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d)."

[5] Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

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27. Will the project involve the conversion or degradation of non-critical natural habitats? Remark: No – The rehabilitation works will primarily follow the existing road corridor/ROW through already disturbed areas. No conversion or degradation of natural habitat is anticipated. Natural drainage paths and seasonal runoff channels crossed by the road will be protected through appropriate drainage.		**X**	If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
28. Will this activity require clearance of mangroves?		**X**	If "Yes": Exclude from project.
29. Will this activity require clearance of trees, including inland natural vegetation? **Remark:** Yes (minor) – minimal bush/shrub clearing may be required along road shoulders and the 375 m realignment. No known large trees or critical species occur within the footprint. Clearing will be strictly limited to the road prism and visibility requirements		**X** Already existed road	If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Exclude from project if more that x hectares of tree and vegetation cutting is expected. 2. Include E&S risk management measures in bidding documents.
30. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?		**X**	If "Yes": Exclude from project.
ESS7			
31. Are there any Indigenous Peoples or Sub-Saharan African Historically Underserved Traditional Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively? ***Remark:*** No – the Galgala/Bosaso area does not include groups meeting ESS7 criteria and communities are mainstream Somali clans.		**X**	If "Yes": Prepare an Indigenous Peoples Plan OR Include the requirements of an Indigenous Peoples Plan in the SEP.
ESS8			
32. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility? ***Remark:*** No – no historical, archaeological or culturally significant sites were observed along the alignment during screening.		**X**	If "Yes": Apply Chance Find Procedures in Annex 5.
33. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there? ***Remark:*** No – no graves, shrines, sacred trees or memorials were observed near the alignment during screening. Because cut/fill, realignment and Irish crossing excavation will disturb subsurface soils, chance finds are still possible. The Chance		**X**	If "Yes": Apply Chance Find Procedures in Annex 5.

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Find Procedures will be applied and integrated into the C-ESMP and toolbox talks.			
ESS10			
34. Is there a risk that stakeholders, including women and vulnerable groups, are not meaningfully consulted or kept informed during preparation and implementation of the subproject? ***Remark:*** No – a community consultation was held in Galgala with 21 participants (10 male, 11 female): local farmers and pastoralists, elders, women's representatives, youth, the Village Development Committee (VDC), road users and Bosaso District Administration.		**X**	
35. Are women likely to participate in decision-making processes in regards to the activity?	**X**		
36. Is there a risk that vulnerable groups may face barriers to participating in consultations or accessing the project Grievance Mechanism (GM)? Remark: No – Vulnerable groups will be included in stakeholder consultations and provided with accessible grievance channels through the S-FSRP GM (Hotline 3060) throughout project implementation.		**X**	
37. Is there a risk that the activity will have poor access to beneficiaries? Remark: No – The rehabilitation of the Galgala Feeder Road will improve access for farmers, pastoralists, road users and surrounding communities to markets and essential services.		**X**	

3. Conclusion

Based on the result from the screening above, please list the E&S risk management instruments to be prepared / adopt and implemented:

a) Risk rating classification: Moderate. The sub-project is not excluded (no exclusion criteria triggered).
b) Site-specific ESMP – prepared for the Rehabilitation of Galgala Feeder Road, covering earthworks, erosion and drainage, dust and noise, solid/hazardous waste and spills, material sourcing/borrow areas, minor vegetation clearance, OHS, construction traffic and community safety.
c) E&S risk management measures and ESMP obligations to be included in the bidding and contract documents; Contractor to prepare and implement a Contractor's ESMP (C-ESMP) including OHS

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Plan, Traffic Management Plan, Waste Management Plan, Erosion and Sediment Control Plan, and temporary access management measures

d) Labour Management Procedures: age verification (no child or forced labour), written contracts, equal pay, Workers' Grievance Mechanism, PPE and OHS measures, Workers' Code of Conduct and SEA/SH prevention measures.
e) ESMF and Stakeholder Engagement Plan (SEP) measures: inclusive consultation of women and vulnerable groups, and the S-FSRP Grievance Mechanism (Hotline 3060) with a confidential, survivor-centred SEA/SH channel.
f) Chance Find Procedures to be applied during all excavation and earthworks as a precautionary measure.
g) **ESS5:** No RF/RAP or VLD is required. The existing public ROW is confirmed by Bosaso Local Government, with no land acquisition, physical or economic displacement, structures, businesses or informal economic activities within the works footprint. Temporary access to farms shall be maintained through phased works and diversions where required.Indigenous Peoples Plan, and security risk assessment (no security personnel to be used).

10.3 Grievance Registration Form

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

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Complainant's request/proposal to resolve grievance (Please explain what should be done to solve this problem)/sharaxaad ku saabsan waxaad ka qabatay si aad uxalisid Cabashda			
Grievance type (environment, human rights, livelihood, health, legal, property, corruption)/Nooca Cabashada sida: Xuquuqda Qofka, noloshada, Caafimaadka, Sharciga iyo musuqmaasuqa			
Level of damage? /Heerka Waxyeelada	Low/hoose	Medium/dhexe	High/sare

10.4 Code of Conduct

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

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

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10.5 Chance Find Procedures

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

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

- Stop the construction activities in the area of chance find temporarily.
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a guard shall be arranged until the responsible local authorities take over. These authorities are [list the responsible authorities under national legislation].
- Notify the relevant [implementing agency field staff] and the relevant [list the responsible local authorities under national legislation] immediately. [Implementing agency field staff] will inform the [implementing agency management].
- The relevant [list the responsible local authorities under national legislation] shall promptly carry out the necessities and inform the [national level cultural heritage or archeology ministry] immediately from the date on which the information is received.
- The [national level cultural heritage or archeology ministry] would be in charge of evaluation /inspection of the significance or importance of the chance finds and advise on appropriate subsequent procedures.
- If the [national level cultural heritage or archeology ministry] determines that chance find is a non-cultural heritage chance find, the construction process can resume.
- If the [national level cultural heritage or archeology ministry] determines chance find is an isolated chance find, [national level cultural heritage or archeology ministry] would provide technical supports/advice on chance find treatment with related expenditure on the treatment provided by the entity report the chance find.

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10.6 *Land Ownership*

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DAWLADA PUNTLAND
EE SOOMAALIYA
DOWLADA HOOS EE BOSAASO

PUNTLAND STATE OF SOMALIA
BOSSASO MUNICIPALITY

XAFIISKA DUQA DEGMADA BOOSAASO
OFFICE OF THE MAYOR BOSSASO

Ref: - DHB/XDM/209/26 Date:- 12/09/2026

Subject: Confirmation of Public Land Ownership and Right-of-Way for the Rehabilitation of Galgala Feeder Road

To Whom It May Concern,

Bosaso Local Government hereby confirms that the Galgala Feeder Road, proposed for rehabilitation under the Somalia Food Systems Resilience Project (S-FSRP), is an existing public road and public right-of-way under the jurisdiction and administration of the Government.The road has existed and has been continuously used by the local communities and the general public for many generations.

Following verification by Bosaso Local Government and consultation with the relevant local authorities and community representatives, we hereby certify that:

- The existing Galgala Feeder Road and its established right-of-way are public land/public infrastructure and are not privately owned.
- The land within the existing road corridor required for the proposed rehabilitation is free from private ownership claims, encumbrances, or known land disputes.
- The proposed rehabilitation works will be undertaken within the existing public road alignment/right-of-way.
- Based on the confirmed rehabilitation scope within the existing road corridor, no physical or economic displacement of persons is anticipated as a result of land requirements for the project.

This letter is issued as an official confirmation that the Galgala Feeder Road is an existing public road under the jurisdiction and administration of Bosaso Local Government and that the existing road corridor is public land.

Sincerely,

Dr.Cabdiraxmaan Cabdulaahi Cali
Guddoomiyaha Golaha Deegaanka
Ahna Duqa Degmada Bosaaso

OFFICE OF THE BOSASO MAYOR

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