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 Jibagale Feeder Road Project, Garowe District, Nugaal Region

For:

Food Systems Resilience Project (FSRP) – Puntland Component

Date: October 2026

Project Coordinates:

8°29'08.6"N 48°38'15.7"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

This Environmental and Social Management Plan (ESMP) has been prepared for the Rehabilitation of Jibagale Feeder Road, 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 Activity 3.2.5 and is intended to improve connectivity between agricultural production areas and the wider road network, facilitate movement of agricultural produce and inputs, and improve the reliability of road access during seasonal rainfall. 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 subproject involves rehabilitation of approximately 2.24 km of the existing Jibagale Feeder Road. The road traverses predominantly agricultural terrain that is relatively flat and susceptible to seasonal runoff and localized flooding, which periodically affect road conditions and accessibility. The proposed works comprise grading and improvement of the existing road surface, construction of a 30 m concrete drift with gravel approaches on both sides, associated drainage improvement works, and reinstatement of areas disturbed during construction.

Environmental and social screening undertaken on 10 August 2026 classified the subproject as Moderate Risk. The applicable World Bank Environmental and Social Standards are ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8 and ESS10, while ESS7 and ESS9 are not triggered. The principal potential adverse impacts include soil disturbance; erosion and sediment movement; temporary interference with seasonal drainage; dust and noise; construction and hazardous waste; fuel and oil spills; minor vegetation disturbance; occupational health and safety risks; construction traffic and road-user safety; temporary disruption of farm and road access; labour and working-condition issues; worker-community interaction and SEA/SH risks; and potential chance finds during excavation and other earth-disturbing activities. These impacts are expected to be largely localized, temporary 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 safety, erosion and sediment control, protection of seasonal drainage pathways, safe construction of the concrete drift, dust suppression, waste and spill management, material sourcing, and maintenance of access to surrounding farms and along the existing road. Before mobilization, the Contractor will prepare a site-specific Contractor's ESMP (C-ESMP) incorporating an OHS Plan, Traffic Management Plan, Waste Management Plan, erosion/sediment and drainage controls, vegetation-clearing and reinstatement measures, material-sourcing arrangements, Workers' GM,

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SEA/SH prevention and response measures, Chance Finds Procedure, spill-response measures and temporary-access arrangements.

The Jibagale Feeder Road follows an existing public road corridor confirmed by Garowe Local Government. All proposed rehabilitation works will remain within the existing public corridor. Consequently, no private land acquisition, voluntary land donation, physical displacement or economic displacement is anticipated, and neither a Resettlement Action Plan (RAP) nor VLD documentation is required. Temporary access to surrounding farms will be maintained through appropriate construction sequencing and temporary access arrangements where necessary.

Stakeholder engagement undertaken for the subproject involved farmers, pastoralists, elders, women representatives, youth, Village Development Committee members, road users and Garowe District Administration. Consultations identified road accessibility during rainfall, transportation of agricultural produce, market connectivity, community safety, local employment, maintenance of farm access, timely implementation and continued consultation as important community considerations. The S-FSRP Grievance Mechanism, including Hotline 3060, will remain available throughout implementation. A separate Workers' GM will address workplace grievances, while SEA/SH complaints will be handled through confidential, survivor-centred and consent-based arrangements.

Implementation of the ESMP will require coordinated action by MoAI/S-FSRP, the SPCU Safeguards Team, Garowe District Administration, the Supervising Engineer, the Contractor and community representatives. The Contractor will have primary responsibility for day-to-day implementation of the approved C-ESMP, while the Supervising Engineer and SPCU will monitor compliance, incidents, corrective actions, stakeholder engagement and environmental and social reporting.

The estimated ESMP implementation budget is USD 15,000, covering OHS and PPE, traffic and community safety, dust suppression, waste and spill management, erosion and drainage protection, SEA/SH prevention, stakeholder engagement, grievance management and environmental and social monitoring.

Overall, the assessment concludes that the Rehabilitation of Jibagale Feeder Road can be implemented with manageable environmental and social risks, provided that the mitigation, monitoring, supervision and institutional measures established in this ESMP and the approved C-ESMP are effectively implemented. The subproject is expected to improve farm-to-market connectivity, movement of agricultural produce and farming inputs, wet-season accessibility, management of seasonal runoff, road durability and local livelihood opportunities, while contributing to the broader food-system resilience objectives of S-FSRP.

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2. Introduction

2.1 Project Overview

The Somalia Food Systems Resilience Project (S-FSRP) is financed by the World Bank and implemented through the Federal Government of Somalia (FGS) in collaboration with participating Federal Member States, including Puntland State of Somalia. The project is designed to strengthen the resilience of food systems and rural livelihoods by supporting climate-resilient agricultural production, improved management of natural resources, and stronger connections between production areas and markets.

Within Puntland, S-FSRP investments respond to constraints affecting agricultural productivity and market access, including limited rural infrastructure, seasonal water-related challenges, weak value-chain connectivity and exposure of farming communities to climate variability. Through targeted infrastructure and institutional support, the project seeks to improve the ability of producers and rural communities to withstand climate-related shocks while strengthening access to markets and livelihood opportunities.

Under Sub-component 3.2: Market Infrastructure and Enterprise Development – Activity 3.2.5, S-FSRP is supporting the Rehabilitation of Jibagale Feeder Road in Jibagale, Garowe District, Nugaal Region. The road serves agricultural production areas and provides an important local connection between farms and the wider road network, supporting the movement of agricultural produce, inputs and road users.

The proposed subproject involves rehabilitation of approximately 2.24 km of the existing Jibagale Feeder Road. The road traverses predominantly agricultural terrain that is relatively flat and susceptible to seasonal runoff and localized flooding. These conditions periodically affect the road surface and reduce accessibility, particularly during rainfall events, making the transportation of agricultural produce more difficult.

The planned works are intended to restore and improve the functionality and climate resilience of the existing road. Key activities include grading and improvement of the existing road surface, construction of a 30 m concrete drift with gravel approaches on both sides, and associated drainage improvement works. The concrete drift and drainage measures are particularly intended to facilitate the safe passage of seasonal runoff and improve road accessibility during wet periods.

The rehabilitation works will remain within the existing public road corridor/right-of-way (ROW), which has been confirmed by Garowe Local Government. No acquisition of private land is required, and the subproject is not expected to result in physical or economic displacement. Access to surrounding agricultural land will be maintained during construction through appropriate sequencing of works and temporary access arrangements where necessary.

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The rehabilitation of Jibagale Feeder Road is expected to provide direct benefits to farmers and other road users by improving access between agricultural production areas and the wider road network. Improved road conditions and drainage are expected to facilitate the movement of agricultural produce, strengthen market connectivity and provide more reliable access during seasonal rainfall, thereby contributing to the broader food-system resilience objectives of S-FSRP.

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 Jibagale Feeder Road in Garowe District, Nugaal Region. The ESMP provides the framework for avoiding, minimizing and mitigating potential adverse impacts while enhancing the environmental and social benefits of the subproject. It also ensures compliance with the World Bank Environmental and Social Framework (ESF), particularly ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8 and ESS10, while ESS7 and ESS9 are not triggered by the subproject, as well as applicable Puntland State environmental legislation, including the Environmental Impact Assessment Act (2023).

This ESMP serves as a practical implementation and compliance instrument for the S-FSRP SPCU, Contractor, Supervising Engineer, relevant government institutions and other parties involved in the works. Specifically, it is intended to:

- Prevent, minimize and mitigate adverse environmental and social impacts during site preparation, construction, operation and maintenance of the rehabilitated feeder road
- Promote safe, healthy and inclusive working conditions and protect farmers, road users and surrounding communities from construction-related risks
- Ensure systematic monitoring, documentation and reporting of environmental and social performance
- Define clear institutional responsibilities and accountability for ESMP implementation and supervision
- Maintain safe access to surrounding farms and along the existing road corridor during construction
- Strengthen stakeholder engagement and ensure access to the S-FSRP Grievance Mechanism (GM), including appropriate channels for workers and SEA/SH-related complaints

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2.3 Scope of the ESMP

This ESMP covers the environmental and social management requirements associated with all relevant phases of the Rehabilitation of the approximately 2.24 km Jibagale Feeder Road, including:

- Site preparation, surveying, limited vegetation clearing, earthworks, grading and compaction associated with rehabilitation of the existing road
- Construction of a 30 m concrete drift, including gravel approaches on both sides and associated drainage improvement works
- Improvement and grading of the existing road surface and reinstatement of disturbed road shoulders and work areas
- Sourcing, transportation, storage and management of gravel, aggregates, cement and other construction materials from existing approved/licensed sources
- Management of environmental risks associated with dust, noise, construction and hazardous waste, soil erosion, sediment movement, seasonal runoff, drainage interference, fuel/oil spills and localized pollution
- Implementation of occupational health and safety measures for workers, including PPE, plant and equipment safety, excavation safety, heat-stress management and incident/near-miss reporting
- Management of construction traffic, road-user safety and temporary access to surrounding farms during the works
- Management of minor vegetation clearance and restoration of areas disturbed by construction
- Stakeholder engagement, community consultation and implementation of the community and Workers' Grievance Mechanisms, including SEA/SH prevention and referral arrangements
- Application of the Chance Finds Procedure during grading, excavation, concrete drift construction and other earth-disturbing activities
- Monitoring, compliance, reporting and institutional arrangements throughout construction and the subsequent operation and maintenance of the rehabilitated feeder road.

The ESMP is informed by the approved environmental and social screening, site-specific observations, available engineering information and stakeholder consultations undertaken for the Jibagale Feeder Road. The screening classified the subproject as Moderate Risk and identified the principal risks and management measures that are incorporated into this ESMP and will be further translated into site-specific implementation measures through the Contractor's ESMP (C-ESMP).

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2.4 Methodology

The preparation of this ESMP followed a structured methodology aligned with the S-FSRP Environmental and Social Management Framework (ESMF), the World Bank Environmental and Social Framework (ESF), and the Puntland EIA Act (2023). The methodology combined site-level assessment, review of available project information, E&S screening and stakeholder engagement to establish the environmental and social baseline and identify appropriate management measures for the Jibagale Feeder Road rehabilitation. The following approaches were applied:

a. Field Observations and Site Assessments

A technical team conducted site visits to assess the condition of the existing Jibagale Feeder Road and the surrounding project environment. The assessment covered the existing 2.24 km road corridor, seasonal drainage conditions, location of the proposed 30 m concrete drift, gravel approach areas and sections requiring grading and drainage improvement.

Field observations also considered the relatively flat and flood-prone terrain, surrounding agricultural land, farm access, seasonal runoff pathways, existing vegetation, road-user safety and potential environmental and social receptors along the corridor. Site observations were used to identify locations and activities requiring specific environmental and social management measures during construction.

b. Desktop Review

Available project and environmental and social information relevant to the subproject was reviewed to support preparation of the ESMP. The review focused on information applicable to the Jibagale road rehabilitation and its environmental and social setting, including:

- Available Jibagale Feeder Road engineering and technical information
- Available road layout/design information for the proposed 30 m concrete drift, gravel approaches and drainage improvements
- The approved E&S Screening Checklist for the Rehabilitation of Jibagale Feeder Road
- S-FSRP Environmental and Social Management Framework (ESMF) and applicable project E&S instruments
- World Bank Environmental and Social Standards (ESS1–ESS10)
- Applicable Puntland environmental and labour legislation

The desktop review also considered the requirement for the rehabilitation activities to remain within the existing public road corridor and the implications of seasonal runoff and localized flooding for road rehabilitation and environmental management.

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c. Environmental & Social Screening

The S-FSRP E&S Screening Checklist was applied to identify potential environmental and social risks, determine applicable Environmental and Social Standards and establish the E&S instruments and management measures required for the subproject.

The Jibagale Feeder Road was classified as Moderate Risk. Key risks identified through screening include earthworks and erosion, sediment movement, seasonal drainage interference, dust and noise, construction and hazardous waste, material sourcing and transportation, minor vegetation disturbance, occupational health and safety, construction traffic, temporary access disruption, community and road-user safety, and low SEA/SH risks.

This ESMP is based on the environmental and social screening conducted on 10 August 2026 (Annex 10.2). The screening identified relevant requirements under ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8 and ESS10 and established the need for this site-specific ESMP together with the Contractor's ESMP (C-ESMP) and associated management measures. These include OHS, traffic management, waste management, erosion and sediment control, temporary access management, stakeholder engagement, grievance management and Chance Finds Procedures.

The screening findings and corresponding requirements are carried forward into the mitigation and monitoring measures presented in Chapters 6 and 7 and the relevant ESMP annexes. ESS7 and ESS9 are not triggered. Under ESS5, the screening confirmed that the works will remain within the existing public road/ROW and that no land acquisition, physical displacement, economic displacement, RAP or voluntary land donation documentation is required.

d. Stakeholder Consultations

Stakeholder engagement was undertaken with Jibagale community members and relevant local stakeholders, including farmers, pastoralists, elders, women representatives, youth, Village Development Committee (VDC) members, road users and Garowe District Administration.

The consultations were used to:

- Understand existing road-access and seasonal accessibility challenges affecting local users
- Identify community concerns and priorities associated with the proposed rehabilitation
- Discuss potential environmental and social risks and appropriate mitigation measures
- Discuss the importance of maintaining access to surrounding farms during construction
- Share information on the S-FSRP Grievance Mechanism (GM), including Hotline 3060

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- Support continued stakeholder participation during construction and implementation of the ESMP.

2.5 Project Activity Description

The proposed Rehabilitation of Jibagale Feeder Road aims to improve year-round accessibility between agricultural production areas in Jibagale and the wider road network through rehabilitation and improvement of approximately 2.24 km of existing feeder road. The intervention responds particularly to road deterioration associated with seasonal runoff and localized flooding within the relatively flat agricultural terrain. The works are expected to facilitate the movement of agricultural produce, improve farm-to-market connectivity and provide more reliable access during seasonal rainfall.

Key Project Components

- **Rehabilitation and Grading of the Existing Road**

Rehabilitation of approximately 2.24 km of the existing Jibagale Feeder Road, including grading, reshaping and compaction of the road surface and improvement of deteriorated sections.
Works will be confined to the existing road corridor/ROW.

- **Construction of 30 m Concrete Drift**

Construction of a 30 m concrete drift at the seasonal drainage crossing to facilitate the controlled passage of runoff across the road and reduce disruption to road access during periods of seasonal rainfall. Associated works will include preparation of the crossing area, excavation, concrete works and reinstatement of disturbed areas.

- **Gravel Approaches to the Concrete Drift**

Construction and improvement of gravel approaches on both sides of the proposed concrete drift to provide a stable transition between the existing feeder road and the crossing structure. The approaches will be appropriately graded and compacted to improve road functionality and reduce erosion around the crossing.

- **Drainage and Runoff Management**

Implementation of associated drainage improvement measures along the road and around the concrete drift to improve the conveyance of seasonal runoff, minimize water accumulation on the carriageway and reduce erosion and sediment movement.

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- **Road Finishing and Site Reinstatement**

Following completion of the main works, disturbed road shoulders, temporary work areas and areas affected by construction will be reinstated as appropriate. Construction waste and surplus materials will be removed or managed in accordance with the ESMP and C-ESMP requirements.

- **Inspection, Commissioning and Handover**

The completed road, concrete drift, gravel approaches and associated drainage works will be inspected to verify conformity with the approved technical requirements and satisfactory completion of environmental and social reinstatement measures prior to handover.

Road Rehabilitation – Workforce Composition

The implementation of the Jibagale Feeder Road rehabilitation is expected to require approximately 35 workers at peak construction periods, comprising skilled and unskilled workers together with site supervision and management personnel. The majority of the workforce will be recruited locally from Jibagale and the wider Garowe District. Workers will commute to the project site daily and no labour camp will be established.

For workforce planning, the anticipated peak workforce is structured as follows:

- Total workers: 35
- Skilled/semi-skilled workers: 12
- Unskilled workers: 19
- Engineers and site management personnel: 4

Local recruitment will be prioritized, particularly for available unskilled and semi-skilled positions. Skilled and technical personnel not available within Jibagale may be sourced from Garowe District. This approach will help minimize labour influx and associated community interaction risks.

No subcontracting is currently anticipated. The workforce will be directly managed by the main Contractor and will be subject to the S-FSRP Labour Management Procedures (LMP), occupational health and safety requirements, Workers' Code of Conduct and Workers' Grievance Mechanism.

Employment opportunities will be provided on a non-discriminatory basis, with equal pay for equal work regardless of gender. Women and youth will be encouraged to participate in suitable employment opportunities in accordance with the S-FSRP LMP and applicable labour requirements

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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 Jibagale 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 Jibagale 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 to the management of dust and noise emissions, construction and hazardous waste, fuel and oil handling, concrete waste and washout, erosion and sediment movement, and prevention of pollution of soil and seasonal drainage channels during road rehabilitation works.
ESS4	Community Health and Safety	Applies to manage community and road-user safety risks associated with construction traffic, moving machinery, open excavations and work areas, dust, noise, temporary access disruption, and worker-community interactions during implementation. Particular attention will be given to farmers, pedestrians and other users of the Jibagale Feeder Road
ESS5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	The Jibagale Feeder Road is an existing public road/right-of-way. Garowe 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	Relevant with low risk. Minor and localized vegetation disturbance may occur during road Rehabilitation, drainage works and associated earthworks. Unnecessary vegetation

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	and at drainage and crossing works; no critical or natural habitats are present.	clearance will be avoided and disturbed areas reinstated where appropriate
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)** – sustainable land management, soil conservation and prevention of land degradation and erosion
- **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 promoting climate-resilient road infrastructure, managing erosion and seasonal runoff, minimizing unnecessary vegetation disturbance, applying safe labor and occupational health and safety practices, and ensuring responsible management of construction and hazardous waste.

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4. Project Area Description

4.1 General Location

The proposed Rehabilitation of Jibagale Feeder Road will be implemented in Jibagale, Garowe District, Nugaal Region, Puntland State of Somalia. Jibagale 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 between surrounding agricultural production areas and the wider road network, serving farmers, local communities and other road users.

The approximately 2.24 km Jibagale Feeder Road follows an existing road corridor through relatively flat, predominantly agricultural terrain that is susceptible to seasonal runoff and localized flooding. During rainfall periods, runoff and inadequate drainage affect sections of the road, reducing accessibility and creating difficulties in the movement of agricultural produce and other road users.

The proposed intervention will improve the existing feeder road through grading and improvement of the road surface, construction of a 30 m concrete drift with gravel approaches on both sides, and associated drainage improvement works. The concrete drift and drainage measures are intended to improve the passage of seasonal runoff across the road and increase the reliability of access during wet conditions.

The road is already used to access surrounding agricultural areas and supports the movement of farmers, agricultural produce, farming inputs and other road users. Rehabilitation of the road is therefore expected to improve farm-to-market connectivity, seasonal accessibility and the overall reliability of transport within the Jibagale agricultural area.

GPS coordinates recorded during the field assessment are: **8°29'08.6"N 48°38'15.7"E.**

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Figure 1: Jibagale Village site map

4.2 Land Ownership and Tenure

The proposed Jibagale 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 serving the Jibagale agricultural area and surrounding farms. Garowe 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 grading and improvement of the existing road, construction of the 30 m concrete drift with gravel approaches on both sides, and associated drainage improvement works, 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, the works will remain within the existing public corridor. Temporary access to surrounding farms will be maintained during construction through phased works and temporary access arrangements where required.

Land/ROW verification and community consultations confirmed that:

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- The Jibagale 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 no private land acquisition is required for the planned works.
- 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 access to surrounding agricultural land.
- Where short-term access restrictions become necessary during construction, affected farmers and road users will be informed in advance and temporary access arrangements will be provided where reasonably practicable.
- 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, neither VLD documentation nor a Resettlement Action Plan (RAP) is required for the subproject. 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

4.3 Accessibility and Infrastructure

Access Roads

The project area is accessible through the existing local road network connecting Jibagale and surrounding agricultural areas with Garowe District. The Jibagale Feeder Road itself provides an important connection between farms and agricultural production areas and the wider road network.

The area is characterized by relatively flat agricultural terrain that is susceptible to seasonal runoff and localized flooding. Access is generally possible under normal conditions; however, sections of the existing road may become difficult to use during periods of rainfall due to runoff, water accumulation and inadequate drainage. These conditions are among the principal reasons for the proposed 30 m concrete drift and associated drainage improvements. Appropriate construction traffic management and access arrangements will be implemented to maintain safe movement of road users and construction vehicles during the works.

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Water Supply

Water required for construction activities, including concrete works, compaction, dust suppression and general site use, will be obtained from approved and suitable sources identified by the Contractor. The Contractor will ensure that construction water use does not adversely affect existing community or agricultural water requirements.

Fuel, oils, concrete washout, construction waste and other potential pollutants will be appropriately stored and managed to prevent contamination of soil, agricultural land and seasonal drainage pathways.

Electricity

The road rehabilitation works do not require permanent grid electricity. Any temporary power required for construction activities will be supplied by the Contractor using appropriate temporary power equipment, where necessary. No permanent electrical infrastructure is proposed as part of the Jibagale Feeder Road rehabilitation.

Communication and Internet

Mobile communication will be used for routine coordination between the Contractor, supervision personnel, SPCU and other project stakeholders during implementation. Internet connectivity is not a critical requirement for the physical road rehabilitation works, although it may be used where available for project coordination, reporting and transmission of site information.

4.4 Social Conditions

- **Socio-economic Context**: Jibagale is a rural agricultural community in Garowe District, Nugaal Region, where livelihoods depend primarily on agriculture and associated trade and transport activities. The existing feeder road provides an important connection between agricultural production areas and the wider road network. Seasonal runoff and localized flooding affect road accessibility and can create difficulties in transporting agricultural produce, particularly during rainfall periods.
- **Livelihoods:** Agriculture is the predominant livelihood activity within the project area. Farmers use the Jibagale Feeder Road to transport agricultural produce, obtain farming inputs and connect with markets and other services. Rehabilitation of the road is expected to improve farm access, facilitate transportation of agricultural produce and strengthen market connectivity.
- **Women and Youth:** Women and youth form part of the stakeholder groups engaged in the project area and participated in the consultation process. The project will continue to promote their participation in stakeholder engagement and project-related decision-

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making. Women and youth will also be encouraged to access suitable project employment opportunities on a non-discriminatory basis.

- **Access to Basic Services:** The Jibagale Feeder Road contributes to local mobility and connectivity between agricultural areas and the wider road network. Improving the road is expected to provide more reliable access for farmers and other road users, particularly during seasonal rainfall when runoff and localized flooding may affect road conditions.
- **Gender-Based Violence (GBV):** The E&S screening identified a low SEA/SH risk associated mainly with potential worker-community interaction during construction. Workers will sign and comply with the Workers' Code of Conduct and receive SEA/SH awareness. The project will maintain access to the confidential S-FSRP GM and appropriate referral arrangements for SEA/SH cases using survivor-centred, confidential and consent-based procedures.
- **Cultural Heritage:** No known historical, archaeological or culturally significant sites, graves, shrines, sacred trees or memorials were identified within the road works footprint during screening. However, because grading, excavation and construction of the 30 m concrete drift will disturb subsurface soils, a Chance Finds Procedure will be incorporated into the C-ESMP and communicated to workers through relevant induction and toolbox talks.
- **Security:** No government security personnel are expected to be retained specifically for the Jibagale Feeder Road rehabilitation works. The Contractor will coordinate with the SPCU, local authorities and community representatives on any security-related issues that may arise during implementation. No armed personnel will be engaged by the Contractor.
- **Community Health and Safety:** Potential community health and safety risks are associated with construction traffic, moving machinery, dust, noise, open excavations and temporary work areas, and short-term access disruption during construction. These risks will be managed through traffic controls, warning signs, barriers around hazardous work areas, daylight working hours, controlled access, community communication and maintenance of safe temporary access where required. The project is expected to generate positive social benefits through improved farm access, movement of agricultural produce, market connectivity and more reliable road access during seasonal rainfall.
- **Grievance Mechanism:** The S-FSRP Grievance Mechanism (GM), including Hotline 3060, will remain available to project-affected persons and other stakeholders to submit complaints, concerns and feedback related to project activities.

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4.5 Physical and Biophysical Environment

Topography and Soil

The Jibagale Feeder Road passes through relatively flat, predominantly agricultural terrain. The surrounding land is mainly used for farming and related rural activities, and the existing road corridor has already been disturbed through continued use.

Seasonal runoff and localized flooding are the main physical factors affecting the existing road. During rainfall events, water movement across and along sections of the road can contribute to deterioration of the road surface, localized erosion and reduced accessibility.

Earthworks associated with grading, preparation of the concrete drift and drainage improvements may temporarily expose soil to erosion and sediment movement. Appropriate compaction, erosion control and reinstatement measures will therefore be applied during construction.

Water Supply System

The project does not involve development of a water supply system. The principal water-related feature relevant to the road rehabilitation is seasonal surface runoff and the drainage pathway at the location of the proposed concrete drift.

Construction activities will be managed to prevent sediment, concrete washout, fuel, oils, construction waste and other pollutants from entering seasonal drainage pathways or affecting surrounding agricultural land. Construction materials and waste will not be placed within drainage channels or locations where they could obstruct natural runoff.

Climate

The Jibagale area is characterized by generally dry to semi-arid climatic conditions, with rainfall occurring seasonally and influencing agricultural activities and road accessibility. Seasonal rainfall and associated runoff are particularly relevant to the design and environmental management of the feeder road rehabilitation.

Periods of dry and windy weather may increase dust generation during grading, material transport and other earthworks, while rainfall events may increase erosion, sediment movement and localized flooding. These seasonal conditions will be considered in construction scheduling and implementation of dust, erosion and drainage-control measures.

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The road rehabilitation, particularly the proposed concrete drift and associated drainage improvements, is intended to improve the resilience of the existing road to seasonal runoff and wet-weather accessibility constraints.

Hydrology and Drainage

Seasonal runoff and localized flooding are important considerations along the Jibagale Feeder Road. The existing road crosses a seasonal drainage pathway where runoff can affect road accessibility during rainfall periods.

The proposed rehabilitation therefore includes construction of a 30 m concrete drift with gravel approaches on both sides and associated drainage improvement works. These measures are intended to facilitate controlled passage of seasonal runoff across the road, reduce water-related deterioration of the road surface and improve wet-season accessibility.

During construction, temporary erosion and sediment controls will be used where necessary to prevent excavated soil, construction materials and concrete-related waste from obstructing or contaminating drainage pathways. Drainage functions will be maintained throughout the works as far as practicable.

Wildlife

The project area is predominantly agricultural and already influenced by farming, road use and other human activities. The approved E&S screening did not identify critical habitats, sensitive biodiversity areas or ecosystems of significant biodiversity importance within the project footprint.

Vegetation along the existing road corridor and seasonal drainage crossing is generally limited to scattered bushes and shrubs. Minor vegetation clearance may be required along road shoulders and around the concrete drift works; however, clearing will be confined to areas necessary for construction and road safety. No known large trees or critical species were identified within the works footprint during screening.

Unnecessary vegetation clearance will be avoided, and areas disturbed by construction will be stabilized and reinstated as appropriate following completion of the works.

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5. Evaluation of Environmental and Social Impacts

5.1 Introduction

This chapter presents the assessment of potential environmental and social impacts associated with the Rehabilitation of the Jibagale Feeder Road during site preparation, construction/rehabilitation, and operation and maintenance. The assessment reflects the characteristics of the existing 2.24 km road corridor, surrounding agricultural land, seasonal drainage conditions, proposed 30 m concrete drift and gravel approaches, and associated drainage improvement works.

The assessment considers both beneficial and adverse impacts. Potential adverse impacts are evaluated according to their nature, affected receptors, project phase and significance before and after application of mitigation measures.

The Jibagale Feeder Road subproject has been classified as Moderate Risk through the approved E&S screening. The principal risks are localized and primarily associated with earthworks and soil disturbance, seasonal runoff and erosion, dust and noise, construction waste, fuel and oil handling, construction traffic, occupational health and safety, temporary farm-access disruption, worker-community interaction, minor vegetation clearance and potential chance finds.

The impacts are expected to be temporary, localized and manageable through standard construction controls and the mitigation measures established in this ESMP and the Contractor's C-ESMP.

The assessment presented in this chapter is directly linked to the approved E&S Screening Checklist in Annex 10.2. Risks identified during screening are carried forward into the impact assessment and mitigation framework, thereby ensuring consistency between screening findings, mitigation measures, monitoring requirements and implementation responsibilities.

5.2 Positive Impacts

Rehabilitation of the existing feeder road will improve the connection between agricultural production areas and the wider road network. Improved road conditions are expected to make transportation of agricultural produce, farm inputs and other goods more reliable.

- **Improved Wet-Season Accessibility**

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Construction of the road, gravel approaches and associated drainage improvements will improve passage across the seasonal drainage area. This is expected to reduce access difficulties associated with seasonal runoff and localized flooding, thereby improving the reliability of the road during rainfall periods.

- **Improved Movement of Agricultural Produce**

More reliable road access will facilitate the movement of produce from farms to markets and reduce transportation difficulties experienced by farmers when road conditions deteriorate. Improved access may also reduce delays in transporting agricultural products and inputs.

- **Local Economic and Livelihood Benefits**

Improved road connectivity is expected to support agricultural trade and other local economic activities by facilitating movement between farms, markets and the wider transport network. Farmers and other road users may benefit from reduced transport constraints and more dependable access.

- **Temporary Local Employment**

Road rehabilitation activities will generate short-term employment opportunities. The project anticipates approximately 35 workers at peak construction, with the majority expected to be recruited locally from Jibagale and Garowe District. Local workers will be considered for suitable skilled, semi-skilled and unskilled opportunities in accordance with the S-FSRP LMP and applicable labour requirements.

- **Improved Road and Drainage Function**

Grading of the existing road, construction of the concrete drift and associated drainage improvements will improve road-surface condition and management of seasonal runoff at vulnerable locations. This will contribute to improved durability and serviceability of the rehabilitated road.

- **Increased Resilience to Seasonal Runoff**

The proposed works are expected to improve the road's ability to accommodate seasonal runoff and localized flooding, reducing water-related deterioration at the drainage crossing and improving the reliability of access during wet conditions.

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- **Environmental Benefits**

- Reduced localized road erosion and deterioration through improved drainage and seasonal runoff management.
- Improved conveyance of seasonal runoff through the 30 m concrete drift and associated drainage improvements.
- Improved stability, durability and wet-season accessibility of the rehabilitated road.
- Reduced need for frequent maintenance associated with runoff, localized flooding, erosion and drainage-related road deterioration.

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 Jibagale Feeder Road Rehabilitation

Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
Earthworks and Soil Disturbance	Grading, excavation and preparation of the concrete drift may disturb and expose soil and generate excavated material requiring appropriate management.	Grading, earthworks, drift excavation and drainage works .	Implementation	ESS1; ESS3	Soil, roadside areas, agricultural land	Medium	Low

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Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
Soil Erosion and Runoff	Exposed surfaces may be affected by rainfall and seasonal runoff, potentially resulting in localized erosion and movement of sediment into drainage pathways	Earthworks, steep terrain, concentrated runoff and exposed soil.	Implementation	ESS1; ESS3	Road corridor, soils, drainage pathways and adjacent land	Medium	Low
Interference with seasonal drainage	Construction around the proposed drift could temporarily obstruct or alter runoff if excavated material, construction materials or waste are poorly placed	Drift construction, excavation and temporary material storage	Implementation	ESS1, ESS3, ESS4	Seasonal drainage pathway, road and surrounding farmland	Medium	Low
Dust Emissions	Grading, earthworks, material handling and vehicle movements may generate temporary dust affecting workers, farmers on adjacent plots and road users.	Dry surfaces, grading, hauling and construction traffic	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
Construction Noise and Vibration	Machinery and construction vehicles may temporarily increase noise levels along the road corridor during working hours.	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 and heat stress.	Road construction activities and operation of vehicles, machinery and tools.	Implementation	ESS2	Workers	Medium	Low
Community Health & Safety Risks	Open excavations, active machinery, construction materials and unfinished	Uncontrolled access to active road construction areas.	Implementation	ESS4	Community members, particularly children and vulnerable road users	Medium	Low

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Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
	structures may create risks to community members.						
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 designated disposal plan.	Implementation	ESS3	Site environment, soil, community health	Low	Low
Pollution: Fuel/Oil Spills	Accidental spills from vehicles, machinery or fuel storage may contaminate soil and	Refueling, equipment maintenance and improper storage or handling of fuel and lubricants.	Implementation	ESS3	Soil, surface runoff and drainage pathways	Low	Low

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Impact Category	Description of Impact	Cause	Phase	Relevant ESS	Receptors	Inherent Risk	Residual Risk
	drainage pathways.						
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 Jibagale Feeder Road will generate a range of environmental and social risks requiring appropriate management. Key risks include soil disturbance from grading and earthworks; erosion and sediment movement during rainfall; temporary interference with seasonal drainage; dust and construction noise; solid and hazardous waste; fuel and oil spills; minor vegetation disturbance; occupational health and safety (OHS) risks; construction traffic and road-user safety; community exposure to active work areas; and temporary disruption of access to surrounding farms and sections of the existing road.

Additional risks include labour and working-condition issues, worker grievances, material transport and handling, concrete works and washout, worker-community interactions, SEA/SH risks, and accidental chance finds during excavation for the 30 m concrete drift, drainage works and other earth-disturbing activities.

No armed security personnel will be used on this project. Active construction areas, particularly excavations and works around the concrete drift, will be controlled through barriers, warning signs, traffic-management measures and communication with farmers, road users and local representatives. Temporary access will be maintained where required and reasonably practicable during construction.

The rehabilitation works will use conventional road-construction materials and equipment, including gravel, aggregates, cement and concrete, fuels and lubricants, as well as graders, rollers, excavators, trucks and other construction plant. These materials and equipment will be stored, handled and operated in accordance with appropriate environmental, health and safety measures to prevent spills, pollution, accidents and unnecessary community exposure.

The identified risks are generally predictable, localized and manageable through the measures established in this ESMP and the Contractor's C-ESMP. Positive impacts include improved farm-to-market connectivity, more reliable wet-season access, improved movement of agricultural produce and farming inputs, improved management of seasonal runoff through the 30 m concrete drift and associated drainage works, improved road durability, support to agricultural livelihoods, and temporary local employment opportunities.

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6.2 Mitigation and Monitoring Plan

The following table presents the consolidated mitigation and monitoring plan for the Rehabilitation of Jibagale Feeder Road. It translates the risks identified in the approved E&S Screening Checklist and Chapter 5 into specific mitigation actions, monitoring requirements, indicators and implementation responsibilities.

The plan addresses soil disturbance; erosion and sediment movement; seasonal drainage management; dust and noise; solid and hazardous waste; fuel and oil spills; concrete works and washout; material sourcing and transport; minor vegetation disturbance; occupational health and safety; labour and working conditions; construction traffic and road-user safety; temporary farm and road access; community health and safety; SEA/SH prevention and response; chance finds; and operation and maintenance of the concrete drift and associated drainage infrastructure.

The Contractor will incorporate the applicable measures into the C-ESMP before mobilization and will remain responsible for day-to-day implementation. The Supervising Engineer and S-FSRP SPCU will monitor compliance throughout construction and verify implementation of the required mitigation measures.

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Table 3: ESMP Mitigation and Monitoring Plan – Rehabilitation of Jibagale 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	Inadequate contractor E&S capacity; C-ESMP not prepared or not implemented before works start on the 2.24 km corridor and the 30 m drift.	Disclose and implement this ESMP for all works; assess contractor E&S capacity before mobilization; require an approved C-ESMP covering OHS, traffic management, waste, erosion and sediment control, vegetation clearing, workers' GM, SEA/SH and chance finds before works commence; appoint a qualified E&S/OHS focal person; include ESMP obligations in the works contract; induct all site personnel, including sub-contracted staff, on the approved C-ESMP.	Review of the approved C-ESMP, contract clauses, E&S staffing and induction records.	Before mobilization; monthly during construction	Contractor / SE / SPCU	C-ESMP approved before mobilization; E&S focal person on site; induction records complete for all workers including subcontractors.	Monthly E&S site report by Contractor to the Supervising Engineer (SE) and SPCU.	1300
ESS2 Labour and Working Conditions								
ESS2	Child or forced labour, including through sub-contracted haulage or drift structure works.	Verify the age of all workers against official identification before hiring; maintain a worker register that also covers sub-contracted workers; prohibit child and forced labour, both grounds for immediate dismissal and contract sanction; bind any subcontractor to the same LMP, OHS and Code of Conduct requirements; issue written contracts;	Review of worker register and contracts; random ID spot checks; worker interviews.	Before works; monthly spot checks	Contractor / SE / SPCU	Worker register complete with verified ages; no worker under 18 on site; sub-contracted workers registered and contracted.	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)
		display the minimum-age requirement at the site.						
ESS2	Unclear employment terms, wage and overtime disputes, excessive hours and heat exposure for a daily-paid workforce of about 35 workers.	Inform all workers of terms before starting and issue written contracts, including for casual daily-paid labour; comply with Somalia labour law and the S-FSRP LMP; limit works to daylight hours (about 07:00–17:00), normally 8 hours per day and 48 hours per week with overtime only by agreement; provide drinking water (minimum 3 litres/worker/day), shaded rest and scheduled breaks during peak heat (about 12:00–15:00); settle pay disputes within 7 days.	Review of contracts, payment and attendance records; inspection of welfare facilities; worker interviews.	Before works; monthly	Contractor / SE	All workers hold signed contracts; hours within limits; drinking water and shaded rest provided; no unresolved pay disputes.	Monthly labour compliance report by Contractor to SE and SPCU.	600
ESS2	OHS risks: drift excavation and formwork, concrete handling, operation of graders, rollers, excavators and haul trucks, work adjacent to live traffic, manual handling, dust, noise, heat stress and fatigue.	Implement a Contractor OHS Plan within the C-ESMP with task-specific risk assessments for drift and drainage works, concrete and formwork, plant operation and work near live traffic; provide and enforce PPE (helmet, safety boots, high-visibility vest, gloves, eye and hearing protection, dust masks); batter or support excavations and restrict access to open cuts; use a trained banksman for reversing and tipping; conduct induction and weekly toolbox talks; maintain a stocked first-aid kit, trained first-aider and documented emergency and medical referral arrangement with the	Daily site inspection; PPE spot checks; review of incident and near-miss register, toolbox-talk attendance and plant inspection records.	Daily; incidents reported within 24 hours	Contractor / SE	PPE in use by 100% of workers; weekly toolbox talks held; zero lost-time injuries; all incidents recorded and investigated.	Daily site log; monthly OHS report to SE and SPCU; incidents reported within 24 hours.	2,600

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		nearest facility in Garowe; keep an incident and near-miss register.						
ESS3 Resource Efficiency and Pollution Prevention and Management								
ESS3	Soil disturbance, erosion and sedimentation: loose material from grading, drift excavation and drainage works washing into the seasonal drainage line and onto adjacent farmland.	Confine earthworks to the design footprint and existing ROW; open only the length of works that can be completed and reinstated in the same period; compact and reshape exposed surfaces without delay; install temporary silt traps, bunds and check structures between the works and the drainage line; keep spoil, stockpiles and topsoil out of the channel and clear of farmland boundaries; reinstate disturbed shoulders and working strips before handover.	Visual inspection of disturbed areas, silt controls and stockpiles; photographic record; post-rainfall inspection.	Weekly; within 48 hours of any rainfall event	Contractor / SE	Silt controls installed and functional; no spoil in the channel; no sediment deposited on farmland; disturbed areas reinstated at handover.	Weekly E&S site report by Contractor to SE; monthly summary to SPCU.	1,200
ESS3	Interference with seasonal drainage and localized flooding during construction of the 30 m concrete drift on a flat, flood-prone alignment.	Programme drift excavation and concrete works for the dry season and avoid periods of forecast rainfall; keep a temporary flow path or diversion open across the works at all times and never leave the channel fully blocked overnight or over a weekend; remove formwork, plant and materials from the channel at the end of each working day; set out inlets, outlets and approaches strictly to the approved design; install rock or stone-pitch scour protection before the first rains; clear the channel of	Inspection of the channel, temporary flow path and scour protection; weather forecast check before concrete pours; verification against design drawings at commissioning.	Daily during drift works; after each rainfall event; at handover	Contractor / SE / MoAI	Flow path maintained at all times; channel clear overnight; scour protection installed before the rains; structure built to design.	Weekly E&S site report; commissioning and handover inspection report to SPCU.	900

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		all temporary works and debris before handover.						
ESS3	Dust emissions from grading, material handling and haulage on a dry gravel road, affecting workers, road users, roadside homesteads and adjacent crops.	Water active work areas, haul sections and stockpiles at least twice daily and more frequently in dry, windy conditions; limit speed to 20 km/h along the corridor and 10 km/h past homesteads; cover haulage trucks carrying fine material; avoid unnecessary double handling of dry material; site stockpiles away from houses and crops; suspend dusty activities where dust is visibly affecting homesteads or after a complaint; provide dust masks to exposed workers.	Visual observation at the corridor boundary and along haul routes; water-bowser records; speed and truck-cover checks; GM log review.	Daily during construction	Contractor / SE	Sprinkling 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.	1,400
ESS3	Noise and vibration from graders, rollers, excavators, concrete works and haul trucks affecting nearby homesteads, road users and livestock.	Restrict works to daylight hours (about 07:00–17:00) and prohibit night work; give advance notice to the community of noisy activities and their duration; fit and maintain silencers on all plant; switch off idle equipment; avoid simultaneous noisy operations close to homesteads; provide hearing protection where exposure is high.	Verification of working hours; plant maintenance records; community complaint log review.	Daily during construction	Contractor / SE	Works consistently within permitted hours; silencers fitted; no unresolved noise complaints.	Daily site log; complaints recorded in the GM log and reported weekly to SE.	100
ESS3	Solid waste and surplus spoil: excavated and unsuitable material, concrete waste and washout from the drift, cement bags, packaging and	Provide labelled waste receptacles at the site and workers' area; segregate organic, inert and recyclable waste; reuse suitable excavated material for shoulder building, approach fill and	Weekly site inspection checklist; waste log and disposal records review; corridor and channel inspection at handover.	Weekly; at handover	Contractor / SE / SPCU	Receptacles in use; waste log and disposal records maintained; no burning or dumping; corridor and channel clear at handover.	Weekly E&S site report to SE; disposal records submitted to SPCU.	500

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	workforce food waste.	reinstatement; dispose of unsuitable and surplus material only at a site agreed in advance with the SE and Garowe District Administration; prohibit open burning and any dumping in the drainage line or on farmland; maintain a daily waste log; leave the corridor clean at handover.						
ESS3	Fuel and oil spills and hazardous waste (used oils, filters, contaminated soil) reaching soil and the seasonal watercourse.	Designate a bunded, covered refuelling and maintenance area on an impermeable surface at least 50 m from the channel, drainage lines and any well; store fuels, oils and lubricants in sealed, labelled containers; prohibit refuelling or servicing within the drainage corridor; keep a stocked spill kit on site and train operators in its use; collect used oils, filters and contaminated soil in sealed containers for removal by an approved handler; clean up and report any spill immediately.	Weekly inspection of storage, bunding and the refuelling area; visual check for staining; spill-kit inventory; hazardous waste disposal records.	Weekly; spills reported immediately	Contractor / SE / SPCU	Fuel stored in a bunded area more than 50 m from the channel; spill kit stocked; disposal records held; zero uncontained spills.	Weekly E&S site report; spill incidents reported to SE and SPCU within 24 hours.	600
ESS3	Material sourcing, haulage and construction water abstraction competing with community and farm use.	Source gravel, aggregates and sand only from existing licensed or approved quarries, with written approval held on site; open no new borrow pit or quarry without a Borrow/Quarry Management note approved by the SE and SPCU, including rehabilitation arrangements; abstract	Review of source approvals and water-source agreements; inspection of haul routes and any borrow area.	Before extraction; monthly; at closure	Contractor / SE / District Administration	Written approvals held for all material and water sources; no new borrow pit opened without approval; no community complaints on sourcing or water use.	Monthly E&S site report to SE and SPCU.	600

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		construction water only from approved sources that do not compete with community or farm use; agree haul routes and timing with the 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 material and fresh concrete at the drift and along the corridor.	Demarcate and barricade all active work areas, excavations and fresh concrete with tape, barriers and warning signs in Somali and English; provide safe pedestrian and livestock routes past the works; backfill or securely cover excavations at the end of each working day; store materials off the carriageway and clear of homesteads and farm accesses; secure plant and keys when not in use; hold community safety awareness sessions, including with women's groups.	Daily inspection of barriers, signage and excavations; awareness session 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.	500
ESS4	Construction traffic and road safety along an active 2.24 km farm road shared with pedestrians, children walking to farms, herders with livestock, donkey carts and motorbikes.	Prepare and implement a Traffic Management Plan within the C-ESMP; limit speed to 20 km/h along the corridor and 10 km/h past homesteads and at active work fronts; erect advance warning, diversion and speed signage at both ends of the works and at each active section; station trained flaggers at the drift and at constricted sections during haulage and	Daily check of signage, flaggers and vehicle speeds; vehicle roadworthiness and driver licence verification; incident log review.	Daily during construction	Contractor / SE	TMP implemented; signage and flaggers in place at all active fronts; all drivers licensed and vehicles roadworthy; zero traffic incidents involving community members or livestock.	Weekly E&S site report; road-safety incidents reported to SE and SPCU within 24 hours.	1,100

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		concrete delivery; keep crossing points open for pedestrians, herders and livestock; use only roadworthy vehicles and licensed, inducted drivers; prohibit night haulage; agree haulage timing with the community to avoid market and school peak times.						
ESS4	Temporary disruption of farm and market access, in particular short closures at the drift during concrete placement and curing.	Programme works in sections and keep at least one passable track or signed bypass open at all times; limit full closure at the drift to the minimum period needed for placement and curing; notify farmers, road users, the VDC and the District Administration at least 7 days before any closure or diversion, stating duration and alternative routes; avoid market days and harvest peaks; maintain access to farms and homesteads; reinstate any access route damaged by the works.	Verification of bypass availability and advance notices; GM log review for access complaints; farm access inspection.	Daily during works at the drift; notices at least 7 days before closures	Contractor / SE / District Administration	Access maintained or bypass provided at all times; notices issued at least 7 days in advance; no unresolved access complaints; damaged accesses reinstated.	Weekly E&S site report; access complaints recorded in the GM log.	400
ESS4	SEA/SH and worker misconduct arising from interaction between the workforce, including a small number of non-local technical staff, and the community.	All workers, including sub-contracted labour, sign the Workers' Code of Conduct before starting work and receive induction in Somali; the CoC prohibits SEA/SH, relations with minors, exchange of favours for sex, harassment and discrimination, with immediate dismissal as a sanction; maintain the local-recruitment, daily-	Review of signed CoC records and awareness registers; GM log review for SEA/SH cases; spot interviews with women's representatives.	CoC signing before works; awareness monthly; GM log continuous	Contractor / SE / SPCU (GBV focal point)	100% of workers signed the CoC before starting; monthly awareness sessions held; confidential pathway operating; cases referred within 24 hours.	Monthly safeguards report to SE and SPCU; SEA/SH incidents reported within 24 hours through the confidential pathway.	800

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		commuting and no-camp arrangement to limit influx; hold monthly SEA/SH awareness sessions for workers and separate sessions for the community including women and girls; operate a confidential, survivor-centred pathway requiring no written evidence and no mediation with the alleged perpetrator, with referral to GBV service providers in Garowe District with survivor consent; display Hotline 3060 at the site and in the community.						
ESS4	Communicable disease and minor pressure on local services from the presence of non-local staff and site sanitation.	Provide health and hygiene induction for all workers; maintain sanitation and handwashing facilities and prohibit open defecation; remove debris and standing water that could create breeding sites; maintain a first-aid and referral arrangement with the nearest health facility; comply with any prevailing public health directives.	Weekly site hygiene inspection; induction records; health incident log review.	Weekly	Contractor / SE	Hygiene facilities maintained; induction completed; no community health complaints linked to the works.	Weekly E&S site report to SE and SPCU.	600
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources								
ESS6	Minor clearing of bushes and shrubs along the shoulders and at the drift, including vegetation holding the banks of the seasonal channel, and obstruction of livestock movement.	Prepare a short vegetation clearing method statement identifying areas to be cleared and retained; limit clearing to the road prism and visibility and safety requirements, with no widening of the corridor; retain bank vegetation outside the structural footprint of the drift; remove	Inspection of cleared areas against the method statement and design footprint; tree-removal approval records; reinstatement and re-vegetation	Monthly; at handover	Contractor / SE	No clearing beyond the approved footprint; no unauthorized tree removal; banks stabilized and re-vegetated at handover; livestock crossings kept open.	Monthly E&S site report to SE and SPCU.	300

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
		any mature tree only with prior MoAI/SPCU approval and documented justification; prohibit charcoal burning and firewood cutting by the workforce; reshape, stabilize and re-vegetate the channel banks and approaches on completion; keep livestock crossing points open during works.	check at handover.					
ESS8 Cultural Heritage								
ESS8	Accidental discovery of archaeological, burial or other culturally significant material during excavation for the drift, drainage structures and grading.	Apply the project Chance Finds Procedure: on discovery, stop work immediately in the affected area, secure and demarcate the location, leave the find undisturbed, and notify the SE, SPCU and the District Administration within 24 hours; resume work in that area only after written clearance from the competent authority; brief all workers and plant operators on the procedure at induction and again before excavation works.	Induction and toolbox-talk records covering chance finds; supervision during excavation; chance-find register.	At induction; continuous during excavation works	Contractor / SE / SPCU / District Administration	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
ESS10 Stakeholder Engagement and Information Disclosure								
ESS10	Inaccessible Grievance Mechanism and inadequate disclosure of works information, aggravated by intermittent mobile coverage and varying literacy	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	GM register review; inspection of GM display and complaint box; verification of advance notices.	GM continuous; display check monthly	SPCU / Contractor / District Administration	GM information displayed and accessible; 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.	700

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ESS	Risk / Impact	Mitigation Measures	Monitoring Method	Frequency	Responsible Party	Monitoring Indicator	Reporting Line & Format	Cost (USD)
	levels along the alignment.	anonymous complaints in Somali, with elders and VDC members as additional entry points where mobile coverage is weak; 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; give advance notice of activities affecting access, dust or noise.						
ESS10	Exclusion of women, elderly people, persons with disabilities and herders from engagement and from project benefits.	Hold separate consultation sessions for women and, where needed, for elderly people, persons with disabilities and herders, at times and locations they can reach; involve women's representatives and the VDC in scheduling works and access arrangements; deliver information verbally in Somali for those who cannot read; maintain a simple engagement log recording who was consulted, issues raised and follow-up, disaggregated by sex and vulnerable group; report back to the community on how concerns were addressed.	Review of the engagement log, attendance registers and consultation minutes.	At start of works, mid-point and handover	SPCU / Contractor / community representatives	Engagement log maintained; women's participation recorded at each consultation; concerns documented with responses and feedback provided.	Monthly safeguards report by SPCU to MoAI/S-FSRP, including consultation records.	400
							Total estimated ESMP implementation cost	**15,000**

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6.3 ESMP Implementation Budget

Implementation of the Environmental and Social Management Plan (ESMP) for the Rehabilitation of Jibagale Feeder Road requires adequate financial resources to implement mitigation and monitoring measures during construction. Key cost items include occupational health and safety (OHS), traffic and community safety, dust suppression, waste management, erosion and sediment control, seasonal drainage protection, spill prevention and response, environmental and social monitoring, stakeholder engagement and grievance management.

The total estimated cost for implementation of the ESMP is USD 15,000. This allocation covers key measures including PPE, safety and warning signage, traffic management, dust suppression, waste management, spill-control materials, erosion and drainage protection, community awareness, SEA/SH prevention, environmental and social monitoring, and other mitigation measures required during road rehabilitation.

Following completion of the works, environmental and social management will primarily focus on road safety, inspection and maintenance of the 30 m concrete drift and associated drainage infrastructure, erosion control, and periodic inspection of the rehabilitated road corridor.

Sustainability of the ESMP measures after project completion will be supported through continued oversight by the relevant Puntland government authorities, including MoAI/S-FSRP and the responsible local/government authority, as applicable. Routine maintenance will include keeping the concrete drift and associated drainage pathways free from sediment, debris and other obstructions, monitoring localized erosion, and maintaining the rehabilitated 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 Jibagale 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

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rehabilitation works. All complaints - verbal, written or anonymous will be received respectfully and handled without discrimination or fear of retaliation.

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 Jibagale 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 review and approval by the Supervising Engineer and the SPCU Safeguards Team. The C-ESMP shall translate the requirements of this ESMP into practical site-level procedures, plans and method statements. At a minimum, it shall include:

No site works shall commence until the C-ESMP has been reviewed and cleared in writing by the Supervising Engineer and the SPCU Safeguards Team. Written clearance shall be issued before the order to commence works and kept on site. Any material changes to the works programme, methods, or site arrangements shall require revision and re-clearance of the C-ESMP before the affected works proceed

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- **Occupational Health and Safety (OHS) Plan** – task-specific risk assessments covering road grading, earthworks, excavation, construction of the 30 m concrete drift and gravel approaches, drainage works, plant–traffic interaction, manual handling, concrete works and heat stress; PPE requirements; induction and toolbox talks; first aid and emergency response; and incident and near-miss reporting and investigation.
- **Traffic Management Plan (TMP)** – warning signage, 20 km/h maximum construction-vehicle speed along the road corridor, additional speed control at active work fronts where required, flag persons, safe movement of construction vehicles and machinery, haul routes, pedestrian and road-user access arrangements, driver requirements and management of construction traffic. Construction activities will be undertaken during daylight hours.
- **Waste Management Plan** – identification and management of excavated material, concrete residues and washout, cement bags, packaging, domestic waste, used oils, filters and other hazardous waste; segregation and safe storage; reuse of suitable excavated material; approved disposal arrangements; and prohibition of waste disposal within seasonal drainage pathways or agricultural land.
- **Erosion, Sediment and Drainage Management Plan** – measures for controlling erosion and sediment from disturbed surfaces; protection of the seasonal drainage pathway; management of runoff around the 30 m concrete drift and gravel approaches; appropriate placement of excavated material and stockpiles; and inspections following significant rainfall events.
- **Vegetation Clearing and Site Reinstatement Method Statement** – restriction of vegetation clearing to areas necessary for the road works, drainage and safety requirements; protection of vegetation outside the works footprint; management of cleared material; and reinstatement and stabilization of disturbed areas following completion. Clearing will primarily involve scattered bushes and shrubs where necessary.
- **Material Sourcing and Haulage Procedure** – confirmation that gravel, aggregates and other construction materials will be obtained from existing approved/licensed sources. Any proposed new material source shall be subject to prior environmental and social review and approval before use.
- **Workers' Grievance Mechanism Procedure** – reporting channels and contact points separate from the community GM; acknowledgement and resolution procedures; confidentiality; protection against retaliation; record keeping; and escalation arrangements where required.
- **SEA/SH Prevention and Response Measures** – Workers' Code of Conduct and signed acknowledgement; worker induction and awareness; prohibition of SEA/SH; confidential and survivor-centred reporting arrangements; S-FSRP Hotline 3060; appropriate referral arrangements with survivor consent; and disciplinary measures for breaches of the Code of Conduct.
- **Chance Finds Procedure** – incorporation of the Chance Finds Procedure provided in Annex 10.5, including immediate cessation of work at the discovery location, securing the area, notification of the appropriate authorities/project personnel, and resumption only after

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appropriate clearance. Workers and equipment operators will receive awareness before excavation and other earth-disturbing activities.

- **Temporary Access Management Protocol** – phasing of works to minimize disruption; maintenance of access to surrounding farms and movement along the existing road; provision of temporary/passable access where reasonably practicable; advance communication with affected farmers and road users; and reinstatement of temporary access areas following completion of works.
- **Spill Prevention and Emergency Response Measures** – requirements for safe fuel and lubricant storage, refuelling arrangements, spill kits, immediate containment and clean-up procedures, contaminated-material management and reporting of significant spills.

The Contractor shall nominate a qualified E&S/OHS focal person, maintain the registers and records required under the ESMP and C-ESMP, and submit monthly environmental and social compliance reports to the Supervising Engineer and SPCU. Required records shall include, as applicable, worker induction and toolbox-talk records, PPE records, incident and near-miss registers, waste records, grievance records, inspection findings and corrective-action tracking.

6.6 Integration of ESMP Requirements into Procurement and Contract Documents

To ensure that the requirements of this ESMP are enforceable, the bidding and contract documents for the works shall include the following:

- **Integration of the ESMP into the contract:** This ESMP, including Table 3 and the C-ESMP requirements in Section 6.5, shall form an integral part of the bidding documents and works contract, either by attachment or reference.
- **Priced provision for ESMP implementation:** The Bill of Quantities (BOQ) shall include a separate priced line or lines for ESMP implementation, corresponding to the estimated **USD 15,000** budget provided in Section 6.3.
- **ESHS personnel requirements:** Bidders shall nominate a qualified Environmental and Social/Occupational Health and Safety (E&S/OHS) focal point responsible for implementation and monitoring of E&S requirements during the works.
- **E&S performance clauses:** Non-compliance with the ESMP or approved C-ESMP shall trigger corrective action. Persistent or serious non-compliance may result in contractual remedies, including withholding of payment, suspension of affected works, or termination, as applicable under the contract.
- **Incident reporting:** The Contractor shall promptly report serious incidents and accidents, including fatalities, serious injuries, SEA/SH allegations, significant spills, and community safety incidents, to the Supervising Engineer and SPCU in accordance with the Project's applicable incident reporting requirements.

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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 Jibagale 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 Jibagale 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.
Jibagale Village/Garowe 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, 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 stakeholder engagement; communicates concerns relating to farm and road access, construction traffic, community safety, dust, noise and temporary disruptions; promotes use of the project GM and 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
- Garowe 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.
- The Supervising Engineer shall assess E&S compliance during each site visit against Table 3 and document any non-compliances and required corrective actions.
- The SPCU Safeguards Team shall conduct periodic joint site visits with the Supervising Engineer and relevant authorities and verify implementation of corrective actions.
- The Contractor and Supervising Engineer shall submit monthly E&S compliance reports to the SPCU for consolidation into the Project's safeguards reporting.
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8. Stakeholder Consultation

8.1 Introduction

Stakeholder consultation was undertaken as part of the environmental and social assessment for the Jibagale Feeder Road Rehabilitation Project in Jibagale Area, Garowe District, Nugal Region. Engaged communities in Jibigale were 32 participants (28 male, 4 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 Jibagale Feeder Road Rehabilitation Project
- Promote Inclusivity: conducting community consultation meetings and stakeholder engagement plans, through local community driven design for rehabilitating Jibagale road that links to main Garowe - Galkayo Road.
- Conduct technical engineering assessments and topography survey of the road and develop ESMPs 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 Jibagale

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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
- Garowe Local Government
- Women's representatives and youth groups
- Farmers, livestock owners, and water users
- Local community members from Jibagale area
- 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 Jibagale 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 mud landslides, severe soil 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 Jibagale Feeder road	Strong community and stakeholder support for the Jibagale 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 Jibagale feeder road rehabilitation and improvements are considered important for farmers and pastoralists to access market hub	Community support for the proposed feeder road rehabilitation, road grading, drainage improvements, culverts, slope

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		centers and main cities	stabilization and erosion control improvements.
Labor Influx Friction and selection process	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 Jibagale 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 centers.

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

This Environmental and Social Management Plan (ESMP) provides the framework for managing environmental and social risks associated with the Rehabilitation of Jibagale Feeder Road. The environmental and social screening classified the subproject as Moderate Risk, with impacts that are generally localized, temporary and manageable through appropriate mitigation, monitoring and supervision.

The proposed works include grading and improvement of the existing road surface, construction of a 30 m concrete drift with gravel approaches on both sides, associated drainage improvements, and reinstatement of disturbed areas. These interventions are intended to improve road functionality, farm-to-market connectivity and accessibility during periods of seasonal runoff and localized flooding.

The principal environmental and social risks include soil disturbance, erosion and sediment movement, interference with seasonal drainage, dust and noise, construction and hazardous waste, fuel and oil spills, minor vegetation disturbance, occupational health and safety, construction traffic and road-user safety, temporary farm-access disruption, labour and working-condition issues, worker-community interaction, SEA/SH risks and potential chance finds.

The rehabilitation works will remain within the existing public road corridor/right-of-way confirmed by Garowe Local Government. No private land acquisition, voluntary land donation, physical displacement or economic displacement is anticipated. Temporary access to surrounding farms and movement along the road will be maintained during construction where necessary.

Stakeholder consultations demonstrated community support for the rehabilitation and emphasized improved farm and market access, local employment, road safety, timely implementation and continued engagement. The S-FSRP Grievance Mechanism, including Hotline 3060, will remain available throughout implementation, together with separate arrangements for worker grievances and confidential SEA/SH complaints.

The Contractor will implement the approved C-ESMP, while the Supervising Engineer and SPCU will monitor compliance, reporting and corrective actions. The estimated ESMP implementation budget is USD 15,000.

Overall, the Jibagale Feeder Road rehabilitation is considered environmentally and socially manageable, provided that the measures specified in this ESMP are effectively implemented. The project is expected to improve farm-to-market connectivity, wet-season accessibility, movement of agricultural produce and inputs, seasonal runoff management, road durability and local livelihood opportunities, supporting the broader resilience objectives of S-FSRP.

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10. Annexes

10.1. Stakeholder Consultation meetings' participant lists

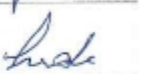
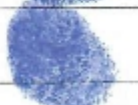
A. ATTENDANCE SHEET FORMAT

Community Meeting: Community meeting (Feeder Road Jibagale)

Location: Jibagale, Garowe Date:

#	Name	Gender	Position	Mobile No.	Signature
1	Abdulahi Said Nour	M	Director	[redacted]	
2	Barkhad Abdi Mohamud	M	Eng		
3	Abdirahman mohamud Hassan	M	ENG		
4	Dr. Abdullahi Mao W.	M.	Director.		
5	Mohamed Mohamoud Farah	m	P.P. Director MoAI-Puntland		
6	Abdihakim Mohamed Osman	M	D.G MoAI		
7	Said Hakim Mohamed	M	Ag. Head Water Engineering Unit		
8	Ahmed wali hersi	m	Bosi Farmer		
9	Ali Abdi Mohamed	m	Qudomiyaha Ward		
10	Abdullahi yusuf Jama	m	Farmer		
11	Mohamed Abdi Elmi	m	Farmer		
12	Ahmed nur Jama	m	Far		
13	Cigaal Abdi Cali	M.	Farmer		

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#	Name	Gender	Position	Mobile No.	Signature
14	Hasson Yusuf Keershe	M	Farmer	[redacted]	
15	Mohamed Hasson Aden	M	Farmer		
16	Abdirozak Ner Jama	M	Farmer		
17	Mohamud Abdullahi Abdi	M	Farmer		
18	Yusuf Cise Mohamud	M	Youth		
19	Abdullahi Ahmed Isse	M	Farmer		
20	Use Mohamud Yusuf	M	Farmer		
21	Mohamud Abdirahman Ahmed	M	For Youth		
22	Aden Abdullahi Ahmed	M	Farmer		
23	Abdirahman Ahmed Abdulle	M	Farmer		
24	Mohamed Cise Ahmed	M	Farmer		
25	Ahmed Cise Ahmed	M	Farmer		
26	Cawil Cirsaq Mohamed	M	Youth		
27	Faduma Salah Duale	F	Farmer		
28	Cajaib Carab Dur	F	Farmer		

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#	Name	Gender	Position	Mobile No.	Signature
29	Salaado Adan Diriye	F	farmer	[redacted]	
30	Hamdi Mohamed Ali	F	farmer		
31	Abdullahi Warsame	M	Fromer		
32	Maxamed Ghiglan	M	FARME		

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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 Jibagale Feeder Road
Subproject Location	Jibagale, Garowe District, Nugaal 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	The subproject is supported under S-FSRP Sub-component 3.2: Market Infrastructure and Enterprise Development – Activity 3.2.5 and involves the rehabilitation of approximately 2.24 km of the existing Jibagale Feeder Road in Garowe District, Nugaal Region. The road provides access to agricultural production areas and farms and connects them with the wider road network. The existing route passes through relatively flat and flood-prone agricultural terrain, where seasonal runoff affects road accessibility and the movement of agricultural produce. The proposed works include rehabilitation and improvement of approximately 2.24 km of the existing feeder road, including grading, construction of a 30 m concrete drift with gravel approaches on both sides, and associated drainage improvement works. Potential E&S risks include earthworks, erosion and sediment movement, seasonal drainage interference, dust and noise, material sourcing, construction traffic, occupational health and safety (OHS), community and road-user safety, minor vegetation disturbance, and construction waste. The rehabilitation is expected to improve farm access, transportation of agricultural produce, market connectivity, and road resilience during seasonal rainfall. 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:*** road gravel, aggregates and other construction materials will be obtained from existing approved/licensed sources. No new borrow pits or quarries will be established for the subproject.		**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 are expected at peak, comprising skilled, unskilled and site management personnel. The majority of workers will be recruited locally from Jibagale and Garowe District. Workers will commute daily and no labour camp is planned **Additional note**: No subcontracting is anticipated for the Jibagale Feeder Road rehabilitation works. All workers will be directly managed by the main Contractor and will be subject to the S-FSRP LMP, OHS requirements, Workers' Code of Conduct, worker registration, and Workers' Grievance Mechanism (GM). The Contractor will remain responsible for full compliance with these requirements throughout construction ***Additional note:*** *Working hours will be limited to daylight hours (about 07:00–17:00), with a normal maximum of 8 hours per day and 48 hours per week, overtime only by agreement and with rest days, in line with the S-FSRP LMP and Somalia labour law. Given heat and remote site conditions, the Contractor will provide drinking water (minimum 3 litres/worker/day), a shaded rest area and scheduled rest breaks during peak heat (about 12:00–15:00).*	**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 – workers may be exposed to hazards from road grading, earthworks, excavation, concrete drift construction, operation of graders, rollers, excavators and haul trucks, manual handling, dust and noise. PPE will be required. The C-ESMP will include a Contractor OHS Plan and a Workers' GM separate from the community GM. ***Additional note:*** *The Contractor OHS Plan will contain task-specific risk assessments (drift construction and formwork, concrete handling, excavation, working near live traffic, plant*	**X**		If "Yes": Apply LMP in Annex 4.

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operation and haulage), heat-stress management, a training and toolbox-talk schedule, and incident and near-miss reporting. The Workers' GM will state its channels and contact points, an acknowledgement time of 48 hours and resolution within 7–14 days, and how unresolved cases are escalated to the project-level GM.			
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 based on the type of work and skill level, with equal pay for equal work regardless of gender, consistent with the S-FSRP LMP. Women will be encouraged to participate in suitable project employment opportunities.		**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 wastes include excavated material from road and drift works, small quantities of concrete waste and washout, cement bags and packaging, domestic waste from workers, and minor hazardous wastes such as used oil and filters. Reusable excavated material will be used where suitable. The Contractor will prepare a Waste Management Plan within the C-ESMP **Additional note:** Suitable excavated material will be reused for road shoulders, approach fill and reinstatement. Unsuitable or surplus material will be disposed of at an approved location agreed with the Supervising Engineer and Garowe District Administration, with no disposal in drainage channels, seasonal watercourses or farmland. Hazardous waste will be stored in sealed, labelled containers within a covered and bunded area and removed by an approved waste handler.	**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.
11. Do any of the construction works involve the removal of asbestos or other hazardous materials? **Remark:** No – the works involve rehabilitation of an existing feeder road and construction of a concrete drift; no asbestos-containing structures or materials are expected to be removed.		**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?	**X**		If "Yes":

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Remark: Yes (temporary) – grading, earthworks and movement of construction vehicles along the 2.24 km feeder road may generate temporary dust affecting workers and road users. Drift construction may also cause localized sediment disturbance during works **Additional note:** Dust is particularly relevant for farmers working on adjacent plots, pedestrians using the road. Minimum controls include water sprinkling at least twice daily or more frequently during dry/windy conditions, a 20 km/h speed limit, covering haulage trucks, locating stockpiles away from farms, and minimizing unnecessary handling of dry materials. Temporary silt controls will prevent sediment from entering drainage lines during construction.			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:** the existing road is affected by seasonal runoff and localized flooding. The proposed 30 m concrete drift and associated drainage improvements are intended to safely convey runoff across the road and improve wet-season accessibility.		**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:** no- the subproject is limited to feeder-road rehabilitation and does not involve the procurement, application or promotion of pesticides, fertilizers or other 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 – farmers, road users, nearby communities and workers may be exposed to construction traffic, moving machinery and dust during the 2.24 km road rehabilitation. Communicable disease risk is expected to be low because the workforce will be mainly local. Additional note: Vulnerable road users mainly include occasional herders moving livestock, who may be less visible	**X**		If "Yes": Apply LMP in Annex 4 and relevant measures in SEP.

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to plant operators. The road is not used at night and construction activities will be limited to daylight hours. Open excavations will be secured before dark.			
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) – the majority of workers are expected to be recruited locally, with only a small number of skilled and technical staff coming from Garowe. Workers will commute daily and no labour camp is planned; therefore, significant pressure on local services is not 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? **Remark:** Yes (low) – worker-community interaction may create a low SEA/SH risk during construction. Workers will sign the Code of Conduct and receive SEA/SH awareness, with access to the confidential S-FSRP GM. Additional note: Beyond the S-FSRP GM (Hotline 3060), SEA/SH cases will be referred to available GBV service providers in Garowe District, as identified in the SEA/SH Action Plan, while ensuring survivor consent, confidentiality and survivor-centred handling at all times	**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 –feeder-road alignment mainly serves agricultural areas, and no schools, health facilities or mosques were identified directly within the works footprint during screening		**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? **Remark:** no government security personnel are expected to be retained specifically for the road rehabilitation works. ***Additional note:*** *Should any security engagement become necessary during implementation, it will comply with ESS4 and the project-level security arrangements, including proportionate use of force, screening and a documented*		**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.

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assessment before deployment. No armed personnel will be engaged by the Contractor.			
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 Jibagale Feeder Road follows an existing public road/ROW confirmed by Garowe Local Government. The rehabilitation works, including the concrete drift and associated road improvements, will remain within the confirmed public corridor and will not require acquisition of private land.		**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 – no houses, structures or other privately owned assets were identified within the road works footprint, and no households or individuals will require relocation.		**X**	If "Yes": Refer to and apply the project RF.
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 –*** no businesses, roadside kiosks, seasonal vendors or other economic activities were identified within the works footprint. Access to surrounding farms will be maintained through phased construction and temporary access arrangements where required. Additional note: Where temporary access restrictions are necessary, affected farmers and road users will be informed in advance through local representatives/VDC and appropriate site communication. A passable access route or temporary bypass will be maintained where reasonably practicable. The Contractor will operate within the existing road corridor. Any unforeseen requirement for works outside the confirmed corridor will be referred to the SPCU for E&S review and re-screening under ESS5, as applicable. ESMP/C-ESMP requirement: The ESMP will include temporary access management measures, while the C-ESMP will establish practical arrangements for advance		**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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communication, signage, phased works and maintenance of safe access during construction.			
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 road corridor was not acquired in anticipation of the project; it is an existing public feeder-road corridor that has been used for community and farm access.		**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 – the rehabilitation does not require new access roads, electricity transmission lines or other associated facilities requiring additional land. Construction materials will be sourced from existing approved/licensed sources.		**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 – the works will use the existing public road/ROW; therefore, no private land or voluntary land donation (VLD) is required.		**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]? **Remark:** the works are confined to the existing feeder-road corridor and no critical habitats or sensitive biodiversity areas were identified within the project footprint during screening.		**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 congregator 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 follows the existing road corridor through predominantly agricultural and already disturbed areas. No conversion of natural habitat is anticipated. The seasonal drainage crossing will be managed through the proposed concrete drift and associated drainage measures.		**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? **Remark:** No – there are no mangroves within or adjacent to the Jibagale feeder-road works footprint.		**X**	If "Yes": Exclude from project.
29. Will this activity require clearance of trees, including inland natural vegetation? **Remark:** Yes (minor) – limited clearing of bushes and shrubs may be required along the existing road shoulders and around the concrete drift works. No known large trees or critical species were identified within the footprint. Vegetation clearing will be limited to the road prism and visibility requirements. ***Additional note:*** *Vegetation at the seasonal drainage crossing is limited to scattered bushes and shrubs; no significant riparian vegetation was identified during screening. Clearing will be minimized and confined to areas necessary for the drift works. The area is predominantly agricultural and no regular livestock/herder movement was identified; however, if livestock movement occurs during construction, safe passage will be maintained. The C-ESMP will include appropriate vegetation-clearing and site-restoration measure*		**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)? **Remark:** No – no ecosystems of significant biodiversity importance or known habitats of threatened or endangered species were identified within the road works footprint during screening.		**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?		**X**	If "Yes": Prepare an Indigenous Peoples Plan OR Include the requirements of an Indigenous Peoples Plan in the SEP.

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Remark: No – the Jibagale/Garowe project area does not include groups identified during screening as meeting the criteria under ESS7.			
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 known historical, archaeological or culturally significant sites were identified along the 2.24 km Jibagale road 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 existing road corridor/pathway during screening. Because cut/fill 30 m concrete drift excavation will disturb subsurface soils; chance finds are still possible. The Chance Find Procedures will be applied and integrated into the C-ESMP and toolbox talks.		**X**	If "Yes": Apply Chance Find Procedures in Annex 5.
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 – stakeholder consultation was conducted in Jibagale involving local farmers, pastoralists, elders, women's representatives, youth, VDC members, road users and Garowe District Administration. These groups will continue to be engaged during project implementation.		**X**	
35. Are women likely to participate in decision-making processes in regards to the activity? **Remark:** Yes – women participated in the project consultation and will continue to be engaged in consultations and project-related decision-making throughout implementation, consistent with the S-FSRP SEP.	**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, including women-headed households, elderly persons, persons with disabilities and		**X**	

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vulnerable road users, will be included in stakeholder engagement and provided access to the S-FSRP GM (Hotline 3060). Additional note: No significant barriers to consultation or GM access were identified during screening. However, minor literacy limitations may affect some vulnerable persons. Where needed, these will be addressed through verbal communication, local focal persons and community meetings, alongside the S-FSRP GM (Hotline 3060). A simple engagement log will be maintained to document participation and follow-up.			
37. Is there a risk that the activity will have poor access to beneficiaries? Remark: No – The rehabilitation of the Jibagale Feeder Road is intended to improve access for farmers, pastoralists and other road users, particularly between agricultural production areas, 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:

Based on the results of the screening above, the following E&S risk management instruments and measures shall be prepared/adopted and implemented:

a) Risk Classification: The subproject is classified as **Moderate Risk**. No exclusion criteria are triggered.

b) Site-Specific ESMP: A site-specific ESMP shall be prepared for the Rehabilitation of the 2.24 km Jibagale Feeder Road, covering road earthworks and grading, construction of the 30 m concrete drift, drainage and erosion control, dust and noise, waste and spill management, material sourcing, minor vegetation clearance, OHS, construction traffic, temporary access, and community and road-user safety.

c) Contractor E&S Requirements: E&S mitigation measures and ESMP obligations shall be incorporated into the bidding and contract documents. The Contractor shall prepare and implement a C-ESMP, including a Contractor OHS Plan, Traffic Management Plan, Waste Management Plan, Erosion and Sediment Control Plan, and measures for maintaining temporary access to farms and road users during construction.

d) Labour Management Procedures (LMP): Applicable LMP requirements shall include age verification, prohibition of child and forced labour, written employment terms, equal pay for equal work, appropriate PPE and OHS measures, a separate Workers' Grievance Mechanism, Workers' Code of Conduct, and SEA/SH prevention and awareness measures.

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e) Stakeholder Engagement and GM: Stakeholder engagement shall be undertaken in accordance with the S-FSRP SEP, with continued consultation of farmers, pastoralists, women, vulnerable groups and road users. The S-FSRP Grievance Mechanism (Hotline 3060) shall remain accessible throughout implementation, including the confidential survivor-centred channel for SEA/SH complaints.

f) Chance Find Procedures: Chance Find Procedures shall be applied as a precaution during grading, excavation, concrete drift construction and other earthworks and incorporated into the C-ESMP and relevant toolbox talks.

g) ESS5 – Land and Access: No RF/RAP or VLD is required. The existing public road/ROW is confirmed by Garowe Local Government, and the works will remain within the existing public corridor. No land acquisition, physical displacement or economic displacement is anticipated. Access to surrounding farms shall be maintained through phased construction and temporary access/diversion arrangements where required.

h) Instruments Not Required: An Indigenous Peoples Plan and security risk assessment are not required based on the screening findings, as ESS7 requirements are not triggered and no security personnel are proposed specifically for the subproject.

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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 noqodo:	Male/lab	Female/dheddig	
GRIEVANCE DETAILS			
Date/Taariikhda			
Description of incident/Qeexid Nooca dhacdada			
Complainant's request/proposal to resolve grievance (Please explain what should be done to solve this 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

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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 the Puntland Environmental Impact Assessment Act (2023) and applicable Federal and Puntland legislation on antiquities and cultural heritage

- 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 the Garowe District Administration and the Puntland Ministry of Information, Culture and Heritage.
- Notify the relevant MoAI/S-FSRP SPCU field staff (Safeguards Officer) and the Supervising Engineer and the relevant Garowe District Administration and the Puntland Ministry of Information, Culture and Heritage immediately. The SPCU Safeguards Officer will inform the SPCU Project Coordinator and MoAI/S-FSRP management.
- The relevant Garowe District Administration and the Puntland Ministry of Information, Culture and Heritage shall promptly carry out the necessities and inform the Federal Ministry of Information, Culture and Tourism (Department of Antiquities and Heritage)immediately from the date on which the information is received.
- The Federal Ministry of Information, Culture and Tourism (Department of Antiquities and Heritage)would be in charge of evaluation /inspection of the significance or importance of the chance finds and advise on appropriate subsequent procedures.
- If the Federal Ministry of Information, Culture and Tourism (Department of Antiquities and Heritage)determines that chance find is a non-cultural heritage chance find, the construction process can resume.
- If the Federal Ministry of Information, Culture and Tourism (Department of Antiquities and Heritage)determines chance find is an isolated chance find, Federal Ministry of Information, Culture and Tourism (Department of Antiquities and Heritage)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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