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ولا ية هر شبيلي الصوما ليه
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مكتب مدير العام

HIRSHABELLE SATE OF SOMALIA
MINISTRY OF AGRICULTURE & IRRIGATION

Ministry of Agriculture and Irrigation, Hirshabelle State

Environmental and Social Management Plan (ESMP)

Construction of the Hirshabelle State Ministry of Agriculture and Irrigation Office Kulmis Village, Jowhar District, Middle Shabelle Region

Somalia Food Systems Resilience Project (S-FSRP, P178566)

Submitted to:
National Project Coordination Unit (NPCU)

Jowhar, Hirshabelle State, Somalia
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Executive Summary

This Environmental and Social Management Plan (ESMP) has been prepared for the construction of a new *Ground+2 (G+2)* office building for the Hirshabelle State Ministry of Agriculture and Irrigation (MoAI), located in Kulmis Village, Jowhar District, Middle Shabelle Region. The sub-project is financed under the *Somalia Food Systems Resilience Project (S-FSRP, P178566)*, Component 4 (Promoting a Greater Focus on Food Systems Resilience in National and Regional Policy Making), Sub-component 4.1. Hirshabelle MoAI has operated since 2015 from a single repurposed house with only two functional offices for over 50 staff; the new building, comprising approximately fourteen offices, a central meeting hall, and dedicated facilities for the Minister, Deputy Minister, and Director General, will provide the working space needed to plan and coordinate agricultural programming across Hirshabelle State. The site — a 100m × 40m (4,000 m²) parcel donated by the Jowhar District Commissioner and Mayor's office — sits in proximity to the Hirshabelle State Presidential Palace (Villa Hirshabelle), within an emerging cluster of state institutional infrastructure.

The environmental and social baseline (Section 3) establishes Jowhar as a riverine agricultural district on the Shabeelle River, exposed to seasonal Gu and Deyr flooding that sustained JOSP, SCRP, and FAO-supported rehabilitation works have progressively mitigated. Water, electricity, and health services in Jowhar are provided principally by private operators, a consideration carried into this ESMP's stakeholder engagement measures. Jowhar town remains under the control of the Federal Government and Hirshabelle State authorities, supported by AUSSOM and the Somali National Army, with no direct attack recorded since 2021.

This sub-project is classified as a ***Moderate Risk*** activity under the World Bank *Environmental and Social Framework (ESF)*. Table 1 sets out a register of 32 site-specific risks and impacts spanning pre-construction, construction, and operation phases, rated on a five-point scale. The most significant risks — rated *Substantial* — concern occupational falls from height during superstructure works, the exclusion of women and vulnerable groups from consultation, and *Gender-Based Violence, Sexual Exploitation, Abuse, and Harassment (GBV/SEA/SH)* linked to workforce influx. Flood exposure and security considerations linked to the site's proximity to Villa Hirshabelle are both assessed as *Moderate*, reflecting mitigating factors specific to this site rather than being treated as generic construction-phase risks.

Table 2 consolidates the corresponding mitigation hierarchy into a single management matrix covering all 32 risks, specifying mitigation measures, verification methods, responsible parties, project phase, timing, and indicative budget treatment. Institutional responsibility follows the two-tier structure applicable to Hirshabelle as one of Somalia's Federal Member States: the *National Project Coordination Unit (NPCU)* retains national oversight, while the Hirshabelle *State Project Coordination Unit (SPCU)* and *State Environmental and Social Safeguards Compliance Officer (SESSCO)* carry out day-to-day supervision and safeguards verification (Section 7). A dedicated Labor Management and Occupational Health and Safety framework (Section 8) and a tiered Grievance Mechanism (GM) spanning community, state, and national levels (Section 10) apply throughout construction and operation, and Section 11 consolidates monitoring indicators, methods, and responsible parties into a single reporting plan.

Stakeholder engagement to date has included a High-Level Project Kick-off and Safeguarding Briefing Meeting held on 11 July 2026 with Hirshabelle MoAI staff, and a follow-up site visit to the donated Kulmis Village parcel on 27 July 2026 (Section 9; Annexes 4 and 5). These sessions confirmed Jowhar District Administration's continued support for the sub-project, incorporated staff feedback on the office design including specific accommodations for women staff members and addressed safeguarding topics including site safety, local labor prioritization, and flood risk management. Further consultation with Jowhar District Administration and Kulmis Village community representatives continues through construction, consistent with the Stakeholder Engagement Plan (SEP).

The total cost of implementing this ESMP is confirmed at USD 75,000, equal to the agreed 5 percent of the total sub-project construction budget, allocated across environmental safeguards, occupational health and safety, community health and safety and security, labor management, stakeholder engagement, waste management, monitoring, and contingency (Section 12). An Environmental and Social Screening Document (Annex 1) confirms that a full Environmental and Social Impact Assessment is not required, and that this ESMP is the appropriate instrument to guide risk management for the sub-project across its full lifecycle, from mobilization through operation.

List of Abbreviations and Acronyms

Abbreviation / Acronym	Full Term
AUSSOM	African Union Support and Stabilization Mission
BOQ	Bill of Quantities
C-ESMP	Contractor's Environmental and Social Management Plan
CERC	Contingent Emergency Response Component
CoC	Code of Conduct
E&S	Environmental and Social
EHS / EHSG	Environmental, Health, and Safety (Guidelines)
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FAO	Food and Agriculture Organization of the United Nations
FGS	Federal Government of Somalia
FMS	Federal Member State
G+2	Ground plus two (upper) floors
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRS	Grievance Redress Service (World Bank)
IDP	Internally Displaced Person(s)
JOSP	Jowhar Offstream Storage Project
LMP	Labor Management Procedures
MoAI	Ministry of Agriculture and Irrigation
NPCU	National Project Coordination Unit
OHS	Occupational Health and Safety
PIM	Project Implementation Manual
PPE	Personal Protective Equipment
RACI	Responsible, Accountable, Consulted, Informed
S-FSRP	Somalia Food Systems Resilience Project
SCRP	Somalia Crisis Recovery Project

Abbreviation / Acronym	Full Term
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
SESSCO	State Environmental and Social Safeguards Compliance Officer
SNA	Somali National Army
SPCU	State Project Coordination Unit
UNFPA	United Nations Population Fund
USD	United States Dollar
WBG	World Bank Group
WMP	Waste Management Plan

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1. Introduction

1.1 Project Background

Somalia's agriculture sector remains highly exposed to recurrent drought, erratic rainfall, and — in riverine districts such as Jowhar — seasonal flooding, all of which strain the institutional capacity needed to plan and deliver an effective agricultural response. The Federal Government of Somalia (FGS), through the *Ministry of Agriculture and Irrigation (MoAI)*, is implementing the *Somalia Food Systems Resilience Project (S-FSRP, P178566)* with World Bank financing, with the *Project Development Objective* of increasing preparedness against food insecurity and improving the resilience of food systems in targeted areas of Somalia, including Hirshabelle State.

The Hirshabelle State Ministry of Agriculture and Irrigation has operated since 2015 from a single repurposed house in Jowhar, previously supported by FAO comprising only two functional offices for the Minister and the Director General — with more than 50 remaining staff sharing a single hall and no dedicated space for equipment or records. This constraint has limited the State Ministry's capacity to coordinate agricultural programming, engage with district-level stakeholders, and support the wider S-FSRP agenda in Hirshabelle.

To address this, the Jowhar District Commissioner and Mayor formally donated a 100m × 40m (4,000 m²) parcel of public land in Kulmis Village, Jowhar District (site coordinates 2°49'40.0"N, 45°30'57.8"E), to Hirshabelle MoAI for the construction of a new State Ministry headquarters (*Bixin Dhul* Land Donation Letter, TIX: DHJ/XGDDM/0114/2025, dated 04 August 2025; full text in Annex 2). The site is located in proximity to the Hirshabelle State Presidential Palace, placing the sub-project within Jowhar's cluster of state institutional infrastructure.

The proposed sub-project comprises a *Ground+2 (G+2)* reinforced concrete office building, providing dedicated space for the Minister, Deputy Minister, Director General, and technical staff, alongside a central meeting hall — a scale calibrated to the State Ministry's current establishment rather than the larger federal headquarters model used in Mogadishu. Environmental and social screening for this sub-project has classified it as a *Moderate Risk* activity under the World Bank *Environmental and Social Framework (ESF)* and the S-FSRP *Environmental and Social Management Framework (ESMF)*, consistent with comparable S-FSRP construction sub-projects (Annex 1). As with those comparable sub-projects, Jowhar's setting as an agricultural district astride the Shabeelle River introduces a flood exposure that this ESMP addresses on its own terms in the environmental baseline and risk sections that follow.

This ESMP has accordingly been prepared to guide environmental and social risk management for the sub-project across its full lifecycle, from mobilization through operation.

1.2 Alignment with S-FSRP Project Components

S-FSRP is structured around five technical components, in addition to a *Contingent Emergency Response Component (CERC)*:

- Component 1: Rebuilding Resilient Agricultural Production Capacity.

- Component 2: Supporting the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes.
- Component 3: Getting to Markets.
- Component 4: Promoting a Greater Focus on Food Systems Resilience in National and Regional Policy Making.
- Component 5: Project Coordination and Management.

This sub-project is financed under Component 4, Sub-component 4.1: Ministerial Capacity Building and Agri-food Policy Assessments for the Crops Sector, which supports technical and institutional capacity building for MoAI at both the Federal Government and Federal Member State levels — including comprehensive capacity assessment and infrastructure upgrading. The construction of the Jowhar office building constitutes the physical infrastructure investment through which Sub-component 4.1 strengthens Hirshabelle MoAI's institutional capacity to deliver its mandate.

1.3 Governing Framework: PIM, SEP, and LMP

This ESMP has been prepared consistent with three S-FSRP instruments, each governing a distinct part of what follows:

- The *Project Implementation Manual (PIM)* establishes the Project's institutional structure. Because Hirshabelle is one of Somalia's Federal Member States (FMS), this sub-project falls under a two-tier institutional arrangement: the *National Project Coordination Unit (NPCU)* retains national coordination and oversight, while a Hirshabelle *State Project Coordination Unit (SPCU)*, supported by a *State Environmental and Social Safeguards Compliance Officer (SESSCO)*, carries out state-level implementation and day-to-day safeguards verification. This arrangement is described further in Section 7.
- The *Stakeholder Engagement Plan (SEP)* sets out the principles for information disclosure and inclusive, culturally appropriate consultation applied in Section 9, including measures for reaching women and vulnerable groups within MoAI staff and the surrounding Kulmis Village community.
- The *Labor Management Procedures (LMP)* govern the labor standards, Code of Conduct, and *Occupational Health and Safety (OHS)* requirements detailed in Section 8, including minimum employment age, prohibition of forced and child labor, and the worker *Grievance Mechanism (GM)*.

1.4 Objectives of the ESMP

The main objective of this ESMP is to ensure that the Hirshabelle MoAI office building is designed, constructed, and operated in an environmentally sound, socially inclusive, and occupationally safe manner. The specific objectives are to:

- Identify environmental and social risks and impacts associated with site preparation, construction, and operation of the G+2 building (Section 5).
- Apply the mitigation hierarchy to avoid, minimize, or manage impacts that cannot be avoided (Section 6).

- Address Jowhar's flood exposure as an agricultural district on the Shabeelle River, alongside the standard construction-phase risks of dust, noise, and vibration (Sections 3 and 5).
- Protect workers' health, safety, and employment rights consistent with the LMP (Section 6).
- Protect the health and safety of MoAI staff, visitors, and the surrounding Kulmis Village community, including in light of the site's proximity to the State Presidential Palace (Section 6).
- Prevent and respond to *Gender-Based Violence (GBV)* and *Sexual Exploitation, Abuse, and Harassment (SEA/SH)* risks through Codes of Conduct, awareness training, and a confidential reporting pathway (Section 6).
- Establish stakeholder engagement and grievance procedures accessible to MoAI staff, Jowhar District authorities, and the local community (Sections 9 and 10).
- Define institutional responsibilities across NPCU, the Hirshabelle SPCU and SESSCO, the Contractor, and the Supervising Engineer (Section 7).
- Establish measurable monitoring requirements and an indicative implementation budget (Sections 11 and 12).

1.5 Methodology

This ESMP was prepared through a desk-based review of the *Bixin Dhul* Land Donation Letter and the architectural drawings for the proposed building, combined with the environmental and social requirements of S-FSRP and the institutional precedent of comparable S-FSRP construction and water-infrastructure sub-projects. Consistent with the SEP, stakeholder consultation with Hirshabelle MoAI staff, Jowhar District authorities, and the Hirshabelle SPCU is being conducted in parallel with this drafting process, with full consultation records appended in Annex 4. The environmental and social baseline in Section 3 draws additionally on published sources concerning Jowhar District's agricultural setting and Shabeelle River flood exposure.

Brief Explanation of Risk Ranking Methodology
The ESMP uses a qualitative risk ranking methodology consistent with the World Bank Environmental and Social Framework (ESF). Risks are screened and ranked based on two core parameters:
1. Likelihood (Probability of Occurrence)
Assessed based on site conditions, past experience, and expert judgment.

- Low – Unlikely to occur
- Moderate – Could occur under certain conditions
- High – Likely to occur without mitigation

2. Consequence (Severity of Impact)
Reflects how serious the environmental or social impact would be if the event occurred.

- Low – Localized, reversible, minimal disruption
- Moderate – Manageable with standard mitigation but may affect communities or workers
- High – Significant, widespread, or long-term impact

3. Risk Rating = Likelihood × Consequence
The combined score categorizes each risk as:

- Low – Minor, routine mitigation required

- Moderate – Needs targeted management measures and monitoring
- Substantial/High – Requires enhanced mitigation, monitoring, and oversight (not applicable here since the project is Moderate)

4. Screening Outcome Informs Management Instruments

The final ranking guides:

- Which ESSs apply
- Whether ESMP or ESIA is required
- Level of monitoring and supervision
- Mitigation measures included in the ESMP

5. Participatory and Evidence-Based

Inputs come from:

- Field observations
- Engineering assessments
- Consultation with communities and authorities
- Review of baseline environmental and social conditions

6. Dynamic and Iterative

Risk ranking is updated throughout the project lifecycle as conditions change, new information emerges, or impacts evolve. Through this combination of technical analysis, regulatory alignment, and community participation, the ESMP provides a realistic, context-appropriate, and operational safeguards framework for the successful construction of G+2 Building for HSS-MoAI Office.

2. Sub-project Description

This ESMP is prepared for the construction of a new State Ministry headquarters building for the Hirshabelle Ministry of Agriculture and Irrigation (MoAI), to be located in Kulmis Village, Jowhar District, Middle Shabelle Region. The building will accommodate MoAI staff, host official meetings, and serve as the operational base for the State Ministry's coordination of agricultural programs across Hirshabelle State, replacing the single repurposed house the Ministry has occupied since 2015.

The construction site is georeferenced at 2°49'40.0"N, 45°30'57.8"E, on a 100m × 40m (4,000 m²) parcel donated to Hirshabelle MoAI by the Jowhar District Commissioner and Mayor (*Bixin Dhul* Land Donation Letter, TIX: DHJ/XGDDM/0114/2025; full text in Annex 2). The land is state-owned public land transferred for this specific institutional purpose, with no competing private claims identified in the donation letter; accordingly, no land acquisition or involuntary resettlement impacts are anticipated (see ESS5 discussion, Section 5).

2.1 Project Components/Activities

Based on the prepared architectural drawings (Annex 3) and Bill of Quantities (BOQ), the sub-project comprises the following components:

- **Substructure:** site clearance, excavation for foundations, and construction of reinforced concrete foundations. The Kulmis site sits at the edge of an agricultural and riverine landscape (Section 3.1); the pre-construction walkover will confirm the extent of vegetation clearing required and verify soil conditions given the area's Vertisol soils, which are prone to poor drainage and, in places, salinity.
- **Superstructure:** construction of reinforced concrete columns, beams, and slabs for the ground, first, and second floors.
- **Walling & Finishes**: infilling with hollow blocks, internal and external plastering, painting, and floor and wall tiling, consistent with standard practice for comparable S-FSRP office buildings.
- **Installations:** doors and windows per the schedule shown in the architectural drawings — Door type D1 (90×210cm), D2 (120×210cm), and D3 (300×250cm); Window type W1 (350×270cm), W2 (300×270cm), W3 (400×300cm), and W4 (90×270cm) — together with complete sanitary fittings for the male and female water closets on each floor.
- **Services:** electrical installation, plumbing, and drainage, detailed through prime cost sums in the BOQ.

2.2 Location

The site sits within Kulmis Village, one of Jowhar town's four constituent urban villages, in proximity to the Hirshabelle State Presidential Palace (Villa Hirshabelle) and other recently constructed state ministry buildings in Jowhar, situating the sub-project within an emerging cluster of Hirshabelle State institutional infrastructure. The site also lies within the Shabeelle River floodplain that defines Jowhar's urban setting; this is addressed in detail in Section 3.1 and carried through the risk assessment in Section 5. Because the site is vacant public land formally donated by Jowhar District authorities

to Hirshabelle MoAI and no physical or economic displacement is anticipated, no Resettlement Action Plan (RAP) is required under ESS5 for this sub-project.

2.3 Timeline & Workforce

The expected construction duration is 8 to 12 months, reflecting the building's smaller scale relative to the Mogadishu federal headquarters (fourteen offices versus thirty-eight). The Project will employ a combination of skilled labor (masons, carpenters, steel benders, plumbers, electricians) and unskilled local labor, with affirmative action for vulnerable and minority job seekers consistent with the LMP. In Somalia, official working hours are eight hours per day, typically from 8:00 a.m. to 5:00 p.m., with scheduled breaks included.

2.4 Materials & Machinery

Construction materials will include ready-mix or site-mixed concrete, reinforcement steel, cement, aggregates, blocks, tiles, paint, PVC, and timber, sourced locally where possible. Machinery will include excavators, concrete mixers or vibrators, and delivery trucks. Unlike the Mogadishu compound, which draws on Mogadishu's municipal water and sewage networks, water, electricity, and sanitation services in Jowhar are provided principally by private operators (Section 3.2). The Contractor will accordingly arrange a dedicated construction water supply through private vendors or the Shabeelle River, with appropriate treatment, and will provide self-contained temporary sanitation facilities for the workforce, both specified in the Contractor's ESMP (C-ESMP). Energy for generators and machinery will be met through fuel purchased from licensed dealers.

2.5 Access

Jowhar is served by two main roads: one connecting south to Mogadishu, the other north to Jalalaqsi — both of which a 2022 government-commissioned flood mitigation assessment characterized as being in poor condition. The Contractor will schedule material deliveries accordingly and coordinate with Jowhar District authorities, noting that access along these routes can be affected by seasonal flooding (Section 3.1).

3. Environmental and Social Baseline Description

3.1 Environmental Baseline

- **Living Environment (Flora & Fauna):** The sub-project site sits at the edge of Kulmis Village within Jowhar's peri-urban and agricultural landscape. Vegetation in the immediate vicinity is limited to scattered shrubs and crop margins typical of the surrounding cropland, with no protected areas, critical habitats, or legally designated conservation sites identified at or adjacent to the site. Given the site's location within an emerging institutional cluster rather than active farmland, disturbance from construction is expected to be limited and localized.
- **Non-Living Environment (Soils, Climate and Topography):** The site lies on flat floodplain terrain within the Shabeelle River valley. Soils are predominantly Haplic Vertisols — fine-textured clays with good water-holding capacity but poor drainage and, in places, salinity — historically used for both rain-fed and irrigated agriculture. Jowhar's climate is semi-arid, with two wet seasons (Gu, March to June, and Deyr, October to November) and two dry seasons (Jilaal and Hagaa); mean annual rainfall is approximately 367mm, and mean monthly temperatures range from approximately 27°C to 30°C. A distinctive feature of the Jowhar reach of the Shabeelle River is that sediment deposition has raised the river channel above the surrounding floodplain, a condition addressed directly below.
- **Hydrology, Water Resources, and Flood Risk:** Jowhar District, including Kulmis Village, lies within the Shabeelle River floodplain and has historically experienced seasonal riverine flooding during the Gu and Deyr rains. Sustained government, community, and development-partner investment — including rehabilitation works under the Jowhar Offstream Storage Project (JOSP) and related canal and embankment rehabilitation supported by SCRP and FAO — has progressively closed river breakage and open-breach points along the Shabeelle River in the Jowhar area, reducing the frequency and severity of uncontrolled flooding relative to past years. On this basis, flood risk at the site is assessed as *Moderate*, reflecting both the area's inherent riverine setting and the mitigating effect of completed and ongoing rehabilitation works. Groundwater in the area is shallow and frequently saline in its upper layers; most residents rely on river water, hand-dug wells, or a limited number of boreholes for domestic and irrigation use.
- **Waste Management:** Solid waste in Jowhar is managed through a combination of informal collection and community-based disposal practices, consistent with capacity levels typical of secondary towns in Hirshabelle State. Construction waste generated by the sub-project will be disposed of at a site designated by Jowhar District authorities, consistent with municipal waste management practice.
- **Cultural Heritage:** Jowhar's built environment includes early-twentieth-century Italian colonial-era infrastructure — a former sugar estate, railway works, and river barrage and weir structures — reflecting the town's history as an agricultural development center. No cultural heritage assets have been identified at the sub-project site itself, and a chance-finds procedure applies in case unexpected cultural or historical material is uncovered during excavation.
- **Land Use and Land Cover:** The site is public land transferred to Hirshabelle MoAI by the Jowhar District Commissioner and Mayor for institutional use, situated at the edge of Kulmis Village within an emerging cluster of Hirshabelle State government infrastructure. Surrounding land use

consists predominantly of irrigated and rain-fed cropland typical of the Jowhar riverine agricultural zone. No agricultural or grazing land is displaced by the sub-project, as works are confined to the donated 4,000 m² parcel.

- **Air Quality and Noise:** Ambient air quality reflects the absence of industrial activity, with dust from vehicle movement and unpaved surfaces the primary concern, particularly during dry seasons. During construction, temporary increases in dust and noise from machinery, generators, and vehicle movement are expected, localized and short-lived, consistent with impacts documented on comparable S-FSRP construction sub-projects.
- **Sensitive or Protected Areas:** No internationally recognized protected areas, wetlands of importance, or designated biodiversity sites are located at or near the site.
- **Climate Change Vulnerability:** Jowhar's setting exposes it to both flood and drought cycles — seasonal riverine flooding during the Gu and Deyr rains, and water scarcity during the Jilaal and Hagaa dry seasons — a duality that makes both the flood-risk mitigation measures and the resource-efficiency measures addressed later in this ESMP particularly relevant to this site.

3.2 Social Baseline

- **Socio-Economic Context:** Jowhar has served as the capital of Hirshabelle State since 2016 and is also the administrative capital of Middle Shabelle Region. The town has recently seen substantial state institutional investment, including the renovation of the Hirshabelle State Presidential Palace (Villa Hirshabelle) and construction of new regional Ministry of Finance and Ministry of Education buildings, reflecting a broader expansion of state government infrastructure in Jowhar of which this sub-project forms part.
- **Livelihoods and Demographics:** Jowhar district's population was estimated at approximately 179,000 in a 2014 UNFPA survey, with a substantial rural population share; the wider Middle Shabelle region's population exceeds one million as of 2024 estimates. The area is predominantly inhabited by Hawiye sub-clans, notably Abgaal, alongside Bantu Shiidle and other minority communities. Agriculture and livestock dominate the local economy, consistent with Jowhar's role as one of Somalia's principal riverine agricultural centers; the main local market operates in Hantiwadag village.
- **Administration and Governance:** The district is governed by the Jowhar District Commissioner and Mayor's office — the signatory of the *Bixin Dhul* Land Donation Letter — alongside the Hirshabelle State government based at Villa Hirshabelle. Coordination with these structures, alongside the NPCU and Hirshabelle SPCU safeguards functions described in Section 1.3, will be central to managing stakeholder engagement, labor recruitment, and grievance handling for this sub-project.
- **Gender Considerations and GBV/SEA/SH Risks:** As elsewhere in Somalia, entrenched gender roles and *Gender-Based Violence (GBV)*, including female genital mutilation/cutting and early marriage, remain documented concerns nationally, with women and displaced populations disproportionately affected. The Contractor Code of Conduct, worker induction, and confidential reporting channels under the Grievance Mechanism (Section 10) apply as a firm requirement given this context.

- **Vulnerable and Minority Groups:** Bantu Shiidle and other minority communities are present in Jowhar district, alongside households displaced by recurring river flooding who reside in IDP settlements near Jowhar town. The Stakeholder Engagement Plan's approach to reaching women, minority groups, and displaced households (Section 9) applies directly to this sub-project's local context.
- **Access to Water, Electricity, and Health Services:** Water, electricity, and basic health services are available in Jowhar but are provided principally by private operators and vendors rather than public utilities — river water and hand-dug wells or boreholes operated by private vendors, generator-based private electricity provision, and a mix of one public and several private hospitals. Because access to these services is cost-dependent, this arrangement carries particular relevance for vulnerable households, including low-income and displaced families, and is a consideration this ESMP carries into its stakeholder engagement and community consultation measures (Section 9).
- **Health and Safety Baseline:** Jowhar is served by one public hospital and several private hospitals. Malaria and waterborne disease risk linked to seasonal flooding are recognized community health concerns, relevant to the community health and safety measures addressed in Section 6.
- **Security Context:** Jowhar town is under the control of the Federal Government of Somalia and the Hirshabelle State government, supported by the African Union Support and Stabilization Mission (AUSSOM) with Somali National Army (SNA) units based in the town; no direct attack on Jowhar town has been recorded since 2021. Security in Jowhar is accordingly assessed as *Moderate Risk*, and contractor mobilization, equipment security, and worker movement will be coordinated with district and state security authorities as standard practice.
- **Child Labour and Vulnerable Workers:** As is common in Somali agricultural and pastoral culture, children are expected to take part in household and farming-related chores from a young age. While this reflects a broader cultural pattern rather than a sub-project-specific finding, the Labor Management Procedures' prohibition on the direct engagement of workers under 18 remains a firm requirement for the Contractor and Supervising Engineer to enforce on-site.
- **Community Organizations and Social Networks:** Local governance in Jowhar operates through the District Commissioner and Mayor's office and an elected district council, which function as the practical entry point for consultation and coordination. Stakeholder engagement for this sub-project builds on these existing structures rather than creating parallel mechanisms.

4. Legal and Regulatory Framework

This chapter sets out the Somali national legal and institutional framework, alongside the World Bank *Environmental and Social Framework (ESF)* provisions, applicable to this sub-project. Where Somali regulations and World Bank policy differ, the World Bank standards prevail.

4.1 National Constitutional Framework

The Provisional Constitution of the Federal Republic of Somalia establishes several provisions directly relevant to this sub-project:

- **Article 10 (Human Dignity):** human dignity is inviolable and must be protected by all state action, including in the conduct of works under this sub-project.
- **Article 11 (Equality):** all citizens have equal rights regardless of sex, clan, disability, or social status, underpinning the sub-project's approach to non-discrimination in recruitment and community engagement.
- **Article 24 (Labor Relations):** every person has the right to fair labor relations, with particular protection for women from workplace abuse, segregation, and discrimination.
- **Article 27 (Economic and Social Rights):** recognizes the right to clean potable water and support for groups, including women and persons with disabilities, who have suffered discrimination.
- **Article 43 (Land):** land is recognized as the primary basis of the people's livelihood and must be held, used, and managed equitably and sustainably, relevant to the donated Kulmis parcel underpinning this sub-project.
- **Article 45 (Environment):** the State must prioritize protection and conservation of the environment, and all persons share a duty to safeguard natural resources.
- **Article 111H (National Security Commission):** establishes the framework for human-security oversight, relevant given this sub-project's location near state institutional infrastructure.

4.2 Relevant National Legislation

This sub-project is implemented in Somalia, as is the comparable Mogadishu MoAI headquarters sub-project, and is accordingly governed by the same body of national legislation:

- **Environmental Protection and Management Act (2024):** guarantees the right to a clean and healthy environment and requires application of the polluter-pays and precautionary principles in project management.
- **Environmental and Social Impact Assessment and Audit Regulations (2024):** governs public participation and incorporation of community views, relevant to the Stakeholder Engagement Plan applied in Section 9.
- **Somali Labour Code (2024):** governs labor conditions, applied through the Labor Management Procedures in Section 6.

- **Somalia National Gender Policy (2016):** sets out strategies to address harmful practices, including female genital mutilation/cutting and child marriage, and to strengthen services for GBV/SEAH cases.
- **Construction Permits Act (2022):** governs permitting requirements applicable to the construction of the office building.

4.3 National Institutional Framework

Institutional responsibility for S-FSRP is structured through the *Project Implementation Manual (PIM)*. Because this sub-project is located in Hirshabelle State, one of Somalia's Federal Member States (FMS), it falls under the PIM's two-tier institutional arrangement for FMS-based sub-projects, distinct from the single-tier arrangement applicable to Banadir-based sub-projects such as the comparable Mogadishu and Dayax examples:

- The *National Project Coordination Unit (NPCU)* retains national coordination, procurement oversight, and final accountability for World Bank reporting.
- The Hirshabelle *State Project Coordination Unit (SPCU)* carries out day-to-day state-level implementation, including supervision of the Contractor and Supervising Engineer.
- The Hirshabelle *State Environmental and Social Safeguards Compliance Officer (SESSCO)* performs state-level safeguards verification, reporting jointly to the SPCU and NPCU's national safeguards team.
- The Project's *Grievance Mechanism (GM)* operates on a tiered basis: complaints are received at community level, escalated to the Hirshabelle SPCU/SESSCO in the first instance, and, where unresolved, escalated further to NPCU, consistent with the PIM's FMS institutional structure (Section 10).

4.4 The World Bank Environmental and Social Framework (ESF)

The following World Bank Environmental and Social Standards (ESSs) are relevant to this sub-project:

Summary of applicable World Bank Environmental and Social Standards (ESSs).

ESS	Relevance to this Sub-project
ESS1: Assessment and Management of E&S Risks and Impacts	Applies throughout; managed through this ESMP.
ESS2: Labor and Working Conditions	Applies to construction workforce; managed through the LMP (Section 6).
ESS3: Resource Efficiency and Pollution Prevention	Applies to construction-phase pollution, water/energy use, and site flood exposure (Section 6).
ESS4: Community Health and Safety	Applies given proximity to MoAI staff, Kulmis Village community, and Villa Hirshabelle (Section 6).

ESS	Relevance to this Sub-project
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Land was formally donated by Jowhar District authorities; no resettlement anticipated.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Minor relevance given the site's peri-urban, already-modified setting; addressed through vegetation-clearance limits (Table 2).
ESS8: Cultural Heritage	Applies given Jowhar's colonial-era heritage context; chance-finds procedure applies.
ESS10: Stakeholder Engagement and Information Disclosure	Applies throughout; managed through the SEP (Section 9).

4.5 WBG EHS Guidelines and Precedence of Standards

The sub-project will adhere to the World Bank Group's General Environmental, Health, and Safety (EHS) Guidelines, which define Good International Industry Practice (GIIP) for managing occupational health and safety, community health and safety, and pollution control. Where Somali national standards are silent, less stringent, or do not exist, the World Bank ESF and EHS Guidelines prevail. This ESMP, together with the LMP, SEP, and WMP, is legally binding on the Contractor, who is required to prepare a Contractor's ESMP (C-ESMP) before commencing works, applying this ESMP's provisions to site-specific conditions.

5. Environmental and Social Risks and Impacts

5.1 Risk Classification

This sub-project is classified as a *Moderate Risk* activity under the World Bank ESF and the S-FSRP ESMF, consistent with comparable S-FSRP construction sub-projects (Annex 1). This classification reflects standard, predictable construction-phase risks, together with the site-specific flood and security considerations described in Section 3, both of which are assessed as Moderate given the mitigating effect of ongoing JOSP and embankment rehabilitation and the stable government control of Jowhar town, rather than elevating the sub-project's overall rating.

5.2 Positive Impacts

The construction of a dedicated headquarters for Hirshabelle MoAI will provide the State Ministry with the working space needed to plan, coordinate, and deliver agricultural programming across Hirshabelle State, a function of particular importance given the State's exposure to recurrent Shabeelle River flooding and its central role in Somalia's riverine agricultural economy. The building strengthens the institutional capacity that S-FSRP Component 4 is designed to build, and complements the wider wave of Hirshabelle State institutional investment already under way in Jowhar, including Villa Hirshabelle and the new regional Ministry of Finance and Ministry of Education buildings. The primary beneficiaries are Hirshabelle MoAI staff, partner agencies, and the wider agricultural community the Ministry serves.

5.3 Risk and Impact Assessment

Table 1 sets out the full register of environmental and social risks and impacts identified for this sub-project across its pre-construction, construction, and operation phases. Risk ratings follow a five-point scale, shown below, consistent with the risk classification in Section 5.1.

Risk rating scale.

Low	Minor	Moderate	Substantial	High

Table 1: Environmental and Social Risks and Impacts.

#	Phase	Risk / Impact	ESS	Risk Rating
1	Pre-construction	Land documentation or boundary demarcation gaps at the Kulmis site.	ESS5	Low
2	Pre-construction	Inadequate site-specific geotechnical and flood-risk investigation prior to finalizing foundation design.	ESS1, ESS3	Moderate
3	Pre-construction / Construction	Exclusion of women, minority groups, or IDP households from consultation.	ESS10	Substantial
4	Construction	Site clearance impacts on residual vegetation and crop margins at the site edge.	ESS6	Low

#	Phase	Risk / Impact	ESS	Risk Rating
5	Construction	Community disturbance in Kulmis Village from site fencing and access restriction.	ESS4	Minor
6	Construction	Inadequate worker welfare facilities — sanitation, rest areas, clean water.	ESS2	Moderate
7	Construction	Soil instability, erosion, and shallow saline groundwater encountered during excavation in Vertisol clay.	ESS3	Moderate
8	Construction	Excavation collapse and trench safety hazards for workers.	ESS2	Moderate
9	Construction	Dust generation during earthworks and general construction activity.	ESS3	Moderate
10	Construction	Falls from height during superstructure (frame) works.	ESS2	Substantial
11	Construction	Struck-by hazards from falling materials or equipment.	ESS2	Moderate
12	Construction	Structural quality-control failures in concrete and reinforcement work.	ESS1, ESS4	Moderate
13	Construction	Noise and vibration from construction machinery and generators.	ESS3	Moderate
14	Construction	Hazardous materials handling and electrical installation safety hazards.	ESS2, ESS3, ESS4	Moderate
15	Construction	Construction waste accumulation and improper disposal.	ESS3	Moderate
16	Construction	Child or forced labor non-compliance.	ESS2	Moderate
17	Construction	Labor disputes over wages, hours, or working conditions.	ESS2	Moderate
18	Construction	Gender-based violence, sexual exploitation, abuse, or harassment linked to workforce influx.	ESS2, ESS4	Substantial
19	Construction	Discrimination in recruitment against women or minority groups.	ESS2	Moderate
20	Construction	Absence of a functional worker Grievance Mechanism.	ESS2	Moderate
21	Construction	Communicable disease transmission between workforce and community.	ESS4	Moderate
22	Construction	Traffic and road-safety incidents on Jowhar's access roads.	ESS4	Moderate
23	Construction / Operation	Security incidents given the site's proximity to Villa Hirshabelle.	ESS4	Moderate
24	Construction	Community exposure to construction hazards — falling debris, open excavations.	ESS4	Moderate

#	Phase	Risk / Impact	ESS	Risk Rating
25	Construction	Fire risk from temporary electrical works or fuel storage.	ESS2, ESS4	Moderate
26	Construction	Disruption from seasonal Shabeelle River flooding coinciding with construction works.	ESS3, ESS4	Moderate
27	Construction	Water-use competition with privately-supplied Kulmis Village households.	ESS3, ESS4	Moderate
28	Construction	Chance finds of cultural or archaeological material during excavation.	ESS8	Moderate
29	Operation	Long-term structural degradation and residual flood exposure of the completed building.	ESS3, ESS4	Moderate
30	Operation	Security risk to MoAI staff and visitors given the institutional cluster location.	ESS4	Moderate
31	Operation	Interruption of privately-provided water, electricity, or waste services affecting building operation.	ESS3, ESS4	Minor
32	Operation	Grievance Mechanism becoming inactive or underused after construction is complete.	ESS10	Moderate

6. Environmental and Social Management Plan (ESMP)

Table 2 translates the risk register in Table 1 into a mitigation hierarchy matrix, consolidated into a single table rather than organized as separate matrices per World Bank Environmental and Social Standard (ESS), as in comparable S-FSRP sub-projects. For each risk, the matrix specifies the mitigation measure, the method or tool used to verify it, the responsible party, the applicable project phase, the timing or frequency of action, and an indicative budget treatment.

Table 2: Environmental and Social Management Plan.

#	ESS	Risk / Impact	Mitigation Measures	Methods / Tools / Verification	Responsible Party	Project Phase	Timing / Frequency	Indicative Budget
1	ESS5	Land documentation or boundary demarcation gaps at the Kulmis site.	Confirm donation documentation and boundary markers with Jowhar District authorities prior to mobilization; resolve discrepancies through the Hirshabelle SPCU before works begin.	Bixin Dhul Land Donation Letter (Annex 2); site demarcation record	Hirshabelle SPCU; MoAI	Pre-construction	Prior to mobilization	Not applicable
2	ESS1, ESS3	Inadequate site-specific geotechnical and flood-risk investigation prior to finalizing foundation design.	Commission a site-specific geotechnical and flood-elevation survey; incorporate findings into the C-ESMP.	Geotechnical survey report; C-ESMP design section	Contractor; Supervising Engineer	Pre-construction	Prior to finalizing design	Included in contractor's BOQ
3	ESS10	Exclusion of women, minority groups, or IDP households from consultation.	Implement the SEP with targeted outreach to women, minority, and IDP representatives in Kulmis Village; document participation in consultation records.	SEP; consultation attendance sheets (Annex 4)	NPCU; Hirshabelle SPCU	Pre-construction through Operation	Ongoing; reviewed monthly during construction	Included in project management budget

#	ESS	Risk / Impact	Mitigation Measures	Methods / Tools / Verification	Responsible Party	Project Phase	Timing / Frequency	Indicative Budget
4	ESS6	Site clearance impacts on residual vegetation and crop margins at the site edge.	Limit clearance to the footprint required for works; avoid disturbance beyond the donated parcel boundary.	Site supervision checklist	Contractor	Mobilization	Prior to and during site clearance	Included in contract price
5	ESS4	Community disturbance in Kulmis Village from site fencing and access restriction.	Coordinate fencing and access arrangements with Jowhar District authorities; notify neighboring residents in advance.	Notification record; fencing/signage inspection checklist	Contractor	Mobilization	Prior to fencing installation	Included in contract price
6	ESS2	Inadequate worker welfare facilities — sanitation, rest areas, clean water.	Provide clean water, segregated sanitation facilities, and rest areas for all workers from mobilization onward.	Site facilities inspection checklist	Contractor	Construction	Continuous from mobilization	Included in contract price
7	ESS3	Soil instability, erosion, and shallow saline groundwater encountered during excavation in Vertisol clay.	Apply standard erosion-control measures (compaction, temporary cover, drainage); adjust excavation and dewatering methods if groundwater is encountered.	Site inspection log; dewatering record if triggered	Contractor	Substructure / excavation	Continuous during excavation	Included in contract price
8	ESS2	Excavation collapse and trench safety hazards for workers.	Shore or slope excavations per the OHS Plan; restrict unauthorized access to open excavations; provide trained supervision.	OHS Plan; excavation inspection checklist	Contractor	Substructure / excavation	Continuous during excavation	Included in contract price
9	ESS3	Dust generation during earthworks and general construction activity.	Apply regular water spraying for dust suppression; cover stockpiles; provide PPE including masks.	Water truck/sprinkler log; PPE issuance log	Contractor	Construction	Daily during earthworks	Included in contract price

#	ESS	Risk / Impact	Mitigation Measures	Methods / Tools / Verification	Responsible Party	Project Phase	Timing / Frequency	Indicative Budget
10	ESS2	Falls from height during superstructure (frame) works.	Provide fall-arrest equipment and harnesses for high-risk tasks; enforce scaffold and edge-protection standards; conduct height-work toolbox talks.	PPE issuance log; toolbox-talk attendance sheets	Contractor	Superstructure	Daily toolbox talks; continuous during frame works	Included in contract price
11	ESS2	Struck-by hazards from falling materials or equipment.	Establish exclusion zones beneath working-at-height areas; enforce hard-hat use; secure materials and tools against falling.	Site inspection checklist	Contractor	Superstructure	Continuous during frame works	Included in contract price
12	ESS1, ESS4	Structural quality-control failures in concrete and reinforcement work.	Verify concrete mix design, curing, and reinforcement placement against approved drawings at each construction stage.	Supervising Engineer sign-off checklist; as-built records	Supervising Engineer; Contractor	Substructure / Superstructure	At each construction stage	Included in supervision budget
13	ESS3	Noise and vibration from construction machinery and generators.	Restrict high-noise activities to standard daytime working hours; maintain machinery; provide hearing protection where thresholds are exceeded.	Work-schedule log; machinery maintenance log	Contractor	Construction	Daily; continuous	Included in contract price
14	ESS2, ESS3, ESS4	Hazardous materials handling and electrical installation safety hazards.	Store paints, solvents, and fuel in secure, bunded areas; ensure licensed electricians undertake all electrical work; provide relevant PPE.	Hazardous-storage inspection checklist; electrician licensing record	Contractor	Finishes / Installations	Continuous during finishing and installation works	Included in contract price
15	ESS3	Construction waste accumulation and improper disposal.	Implement the Waste Management Plan; segregate waste; dispose of at a site designated by Jowhar District authorities.	WMP; waste segregation and disposal log	Contractor	Construction	Continuous	Included in contract price

#	ESS	Risk / Impact	Mitigation Measures	Methods / Tools / Verification	Responsible Party	Project Phase	Timing / Frequency	Indicative Budget
16	ESS2	Child or forced labor non-compliance.	Verify worker ages at recruitment; prohibit forced labor; include prohibition in the Code of Conduct.	Age-verification records; signed Code of Conduct	Contractor	Construction	Prior to and continuous through engagement	Included in contract price
17	ESS2	Labor disputes over wages, hours, or working conditions.	Implement the LMP with clear terms on wages, hours, and grievance channels; ensure timely payment.	Signed contracts; payment logs	Contractor	Construction	Continuous	Included in contract price
18	ESS2, ESS4	Gender-based violence, sexual exploitation, abuse, or harassment linked to workforce influx.	Implement the GBV/SEAH Action Plan; mandatory worker sensitization; confidential reporting channel coordinated by the Hirshabelle SESSCO.	GBV/SEAH Action Plan; training attendance records; confidential reporting log	Contractor; Hirshabelle SESSCO	Construction	Awareness session before mobilization; continuous GM availability	Included in contract price and project management budget
19	ESS2	Discrimination in recruitment against women or minority groups.	Apply affirmative-action provisions of the LMP to promote inclusion of women and minority groups.	Recruitment records disaggregated by gender	Contractor	Construction	At recruitment; reviewed monthly	Included in contract price
20	ESS2	Absence of a functional worker Grievance Mechanism.	Establish and publicize a confidential worker GM, coordinated with the Hirshabelle SESSCO.	GM register and hotline	Contractor; Hirshabelle SESSCO	Construction	Active from mobilization; reviewed monthly	Included in project management budget
21	ESS4	Communicable disease transmission between workforce and community.	Provide health awareness sessions for workers and community; maintain hygienic site conditions.	Awareness session attendance sheets	Contractor	Construction	At mobilization; periodic refreshers	Included in contract price

#	ESS	Risk / Impact	Mitigation Measures	Methods / Tools / Verification	Responsible Party	Project Phase	Timing / Frequency	Indicative Budget
22	ESS4	Traffic and road-safety incidents on Jowhar's access roads.	Coordinate delivery schedules with Jowhar District authorities; set site speed limits; conduct road-safety awareness campaigns.	Traffic Management Plan; coordination record	Contractor; Hirshabelle SPCU	Construction	Continuous	Included in contract price
23	ESS4	Security incidents given the site's proximity to Villa Hirshabelle.	Coordinate site security with Jowhar District and Hirshabelle State security authorities; train security personnel in community engagement.	Signed Security Code of Conduct; coordination record; incident log	Contractor; NPCU/SPCU	Construction and Operation	Continuous; incident reporting within 24 hours	Included in contract price and project management budget
24	ESS4	Community exposure to construction hazards — falling debris, open excavations.	Secure the site with fencing and warning signage; restrict unauthorized access; conduct community awareness on site hazards.	Fencing/signage inspection checklist; awareness attendance sheet	Contractor	Construction	Continuous	Included in contract price
25	ESS2, ESS4	Fire risk from temporary electrical works or fuel storage.	Maintain fire-safety equipment on site; store fuel securely; include fire scenarios in the Emergency Preparedness and Response Plan.	EPRP; fire-safety equipment inspection checklist	Contractor	Construction	Continuous	Included in contract price
26	ESS3, ESS4	Disruption from seasonal Shabeelle River flooding coinciding with construction works.	Schedule substructure works to avoid peak Gu/Deyr periods where practicable; monitor the Jowhar river gauge; maintain contingency plans for work stoppage.	Construction schedule; river-gauge monitoring log; contingency plan	Contractor; Hirshabelle SPCU	Substructure; ongoing during Gu/Deyr seasons	Seasonal (Gu: Mar–Jun; Deyr: Oct–Nov)	Included in project management budget
27	ESS3, ESS4	Water-use competition with privately-supplied Kulmis Village households.	Coordinate construction water sourcing with private vendors and Jowhar District authorities to avoid straining supplies relied on by vulnerable households.	Water-sourcing coordination record	Contractor	Construction	Continuous	Included in contract price

#	ESS	Risk / Impact	Mitigation Measures	Methods / Tools / Verification	Responsible Party	Project Phase	Timing / Frequency	Indicative Budget
28	ESS8	Chance finds of cultural or archaeological material during excavation.	Apply the chance-finds procedure in the S-FSRP ESMF; train the Contractor; halt works in the immediate area if finds occur and notify the Hirshabelle SPCU.	Chance Finds Procedure; incident reporting form	Contractor	Substructure / excavation	Activated only if triggered; reporting within the same day	Contractor's cost; no separate budget unless triggered
29	ESS3, ESS4	Long-term structural degradation and residual flood exposure of the completed building.	Incorporate flood-resilient design features (elevated ground-floor level, adequate drainage); undertake periodic structural inspection during operation.	Design specification; periodic structural inspection report	MoAI; NPCU	Design; Operation	At design stage; annual inspection during operation	Included in operational budget
30	ESS4	Security risk to MoAI staff and visitors given the institutional cluster location.	Coordinate ongoing security arrangements for the building with Hirshabelle State security authorities, consistent with its institutional cluster location.	Coordination record	MoAI	Operation	Continuous	Included in operational cost
31	ESS3, ESS4	Interruption of privately-provided water, electricity, or waste services affecting building operation.	Maintain contingency arrangements — backup generator, water storage — given reliance on privately-provided services.	Facilities inspection checklist	MoAI	Operation	Continuous	Included in operational cost
32	ESS10	Grievance Mechanism becoming inactive or underused after construction is complete.	Transfer the Grievance Mechanism to MoAI's operational management upon handover, with continued NPCU/SPCU oversight.	GM handover record; GM log	MoAI; NPCU/SPCU	Operation	Continuous	Included in operational budget

Note on ESS7 and ESS9: ESS7 (Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities) and ESS9 (Financial Intermediaries) are not applicable to this sub-project and are therefore omitted from this matrix, consistent with their treatment in the parent ESMF.

7. Implementation Arrangements

This section defines the specific responsibilities of each party involved in this sub-project, from Hirshabelle MoAI down to the Contractor executing the works, and closes with a RACI matrix mapping these parties against the sub-project's lifecycle activities. The arrangements below follow the institutional structure set out in the PIM and the engagement principles of the SEP, adapted to this specific sub-project rather than restated generically.

One structural point governs everything that follows: this sub-project sits in Hirshabelle State, one of Somalia's five Federal Member States (FMS). Under the PIM, a State Project Coordination Unit (SPCU) is established in each FMS; Hirshabelle's SPCU, supported by a State Environmental and Social Safeguards Compliance Officer (SESSCO), therefore sits between the NPCU and site-level implementation, assuming responsibility for day-to-day supervision, safeguards compliance, and implementation oversight, thereby enabling the NPCU to focus on strategic coordination, quality assurance, and overall project oversight rather than routine field-level monitoring.

7.1 Hirshabelle State Ministry of Agriculture and Irrigation (MoAI)

Hirshabelle MoAI is the direct beneficiary and eventual operator of the completed building, and was the recipient of the Kulmis land donation underpinning this sub-project (Section 1.1, Hirshabelle MoAI has a direct operational stake here, it will staff, use, and maintain the building once complete. MoAI's day-to-day interest is expressed through the Hirshabelle SPCU (Section 7.3), while national policy alignment runs through NPCU (Section 7.2). Following handover, MoAI's administrative unit assumes responsibility for facility management and maintenance, coordinating with Jowhar District authorities on matters such as site security (Section 3.2).

7.2 National Project Coordination Unit (NPCU)

NPCU holds national coordination, procurement oversight, and World Bank reporting responsibility for this sub-project, consistent with its role across all S-FSRP sub-projects regardless of location. Because Hirshabelle is an FMS with its own SPCU, NPCU's function here is less operationally intensive than for a Banadir-based sub-project, where NPCU must carry out day-to-day supervision directly in the absence of a state tier. Here, NPCU's role centers on national-level technical design review, consolidating the Hirshabelle SPCU's reporting for World Bank submission, and serving as the final point of accountability for second-tier grievances and procurement matters (Section 10.5).

7.3 Hirshabelle State Project Coordination Unit (SPCU) and SESSCO

The Hirshabelle SPCU carries out day-to-day supervision of the Contractor and Supervising Engineer, coordinates with Jowhar District authorities on land, security, and waste-disposal matters, and serves as the first-tier point of contact for the GM (Section 10). The Hirshabelle SESSCO performs state-level safeguards verification — monitoring ESMP and C-ESMP compliance, reviewing the Contractor's monthly reports, and coordinating GBV/SEA/SH case management (Section 10.3) — reporting jointly to the Hirshabelle SPCU and NPCU's national safeguards team. This division of labor is the direct consequence of Hirshabelle's status as an FMS: it distributes the routine verification workload that NPCU would otherwise absorb directly, as it does for Banadir-based sub-projects.

7.4 Contractor

The Contractor is responsible for complying with all requirements of this ESMP and for ensuring that its sub-contractors do the same. Contractual clauses will specify compliance with this ESMP and the WBG EHS Guidelines, alongside national requirements, and will indicate measures to be taken in cases of non-compliance. The Contractor's responsibilities include:

- Ensuring that all operations comply with the mitigation measures set out in this ESMP.
- Ensuring that site personnel understand and implement the control measures in this ESMP and the C-ESMP.
- Reporting severe incidents to the Hirshabelle SESSCO and SPCU within 24 hours, with escalation to NPCU and the World Bank within 48 hours of occurrence.
- Preparing plans for action in the event of spills, leakages, or other environmental emergencies, including flood-related contingencies given the site's setting (Section 3.1).
- Monitoring ESMP implementation against the indicators in this ESMP, the C-ESMP, and Table 7.
- Participating in stakeholder consultations with Jowhar District authorities and the Kulmis Village community.
- Maintaining lists of all workers, including age and gender.
- Developing and maintaining a workers' Grievance Mechanism, coordinated with the Hirshabelle SESSCO.
- Preparing and maintaining an OHS Plan and training all workers on its provisions.
- Ensuring every worker signs a Code of Conduct, including provisions on Sexual Harassment, GBV, and SEA/SH.
- Implementing the Security Management Plan, coordinated with Jowhar District and Hirshabelle State security authorities.
- Undertaking periodic stakeholder engagement with Jowhar District authorities and the local community.

The Contractor will deploy a dedicated E&S/EHS Specialist to operationalize this ESMP, coordinating directly with the Hirshabelle SESSCO. Key tasks include ensuring PPE availability and training, providing OHS training, maintaining incident and accident records with reporting to the Hirshabelle SESSCO and SPCU, ensuring waste management procedures are followed, ensuring water and sanitation facilities are available for all workers, conducting toolbox talks, training workers on the Code of Conduct, liaising with the Hirshabelle SESSCO on GBV/SEAH awareness, and maintaining worker lists and Grievance Mechanism records.

7.5 Supervising Engineer

The Supervising Engineer provides independent technical verification throughout construction: certifying as-built conformity with approved drawings at each construction stage (Table 2, Row 12), verifying structural quality control, and signing off on commissioning only once as-built records confirm that actual site conditions match the design basis, including the flood-resilient design features

referenced in Table 2, Row 29. The Supervising Engineer escalates any non-compliance directly to the Hirshabelle SESSCO and SPCU rather than resolving it unilaterally with the Contractor.

7.6 Jowhar District Authority

The Jowhar District Commissioner and Mayor's office provides local governance coordination: it donated the Kulmis parcel underpinning this sub-project (Section 1.1) and continues to provide traffic and security coordination during mobilization and construction, confirmation of approved waste-disposal sites, and support for stakeholder engagement (Section 9). Given the site's proximity to Villa Hirshabelle, the District Authority's coordination role extends to liaison with Hirshabelle State security authorities on matters affecting the sub-project (Section 3.2).

7.7 RACI Matrix

Table 3 maps each party against the sub-project's lifecycle activities. Where an activity shows more than one Accountable party, this reflects genuine joint accountability in the institutional structure, rather than an unresolved ambiguity.

Table 3: RACI Matrix — Institutional Responsibilities and Lifecycle Activities.

Lifecycle Activity	NPCU	Hirshabelle SPCU/SESSCO	Contractor	Supervising Engineer	Jowhar District Authority	Hirshabelle MoAI
Land donation confirmation, site preparation, and mobilization	I	A	R	C	C	I
Substructure works (foundation and flood-resilience conformity)	I	C	R	A	I	I
Superstructure and finishing works	I	C	R	A	I	I
Commissioning and handover	C	A	C	R	I	C
Building operation and maintenance	I	C	I	I	C	A
Stakeholder engagement and consultation	C	A	C	I	R	C
Grievance handling (project / GBV-SEA-SH / labor / escalated)	C	A	R	I	C	I
E&S compliance monitoring and reporting	C	A	R	C	I	I
Security coordination (proximity to Villa Hirshabelle)	I	C	R	I	A	I
Policy-level oversight and reporting	A	C	I	I	I	A

R = Responsible (does the work) A = Accountable (owns the outcome) C = Consulted I = Informed

8. Labor Management and Occupational Health and Safety

This section sets out how the workforce engaged on this sub-project will be managed and protected, consistent with the Labor Management Procedures (LMP) and World Bank ESS2. It applies across substructure, superstructure, finishing, and installation works, and expands the labor and OHS rows of the Table 2 matrix into a single narrative reference that the Contractor and Supervising Engineer can apply directly on site.

8.1 Categories of Workers Covered

The LMP applies to all workers engaged on the sub-project, regardless of who formally employs them. This includes direct workers employed by the main Contractor, workers engaged by sub-contractors, such as an electrical or plumbing installation sub-contractor, and any community or casual labor drawn from Kulmis Village or wider Jowhar District for ancillary tasks. Where materials such as cement, steel, or blocks are sourced from primary suppliers, the Contractor remains responsible for confirming that no child or forced labor is used in that supply chain, proportionate to the risk involved.

8.2 Minimum Employment Age and Prohibition of Forced and Child Labor

No worker under the age of 18 may be engaged on the sub-project in any capacity, direct or contracted. The Contractor must verify age through national identification or an equivalent document before any worker is allowed on site, and must keep these records available for inspection by the Supervising Engineer and the Hirshabelle SESSCO. This requirement holds regardless of local custom: Section 3.2 notes that children in the wider community commonly take on household and farming-related chores from a young age, but that pattern has no bearing on who may be engaged as project labor. Forced labor in any form, including confiscation of identity documents, debt bondage, or non-payment used to compel continued work, is strictly prohibited and grounds for immediate contract termination.

8.3 Recruitment, Employment Terms, and Non-Discrimination

Every worker must receive a written contract or engagement letter setting out role, wages, hours, and duration before starting work, in a language and format they can understand. Recruitment must be open and non-discriminatory, with clear criteria communicated in advance to avoid the perceptions of unfair hiring flagged as a risk in Tables 1 and 2. The Contractor should prioritize suitable local hiring from Kulmis Village and Jowhar District rather than importing labor by default, applying the LMP's affirmative-action provisions to promote the inclusion of women and minority groups, while still meeting the competency requirements set out in Section 8.4 for specialized roles such as electrical installation.

8.4 Contractor OHS Obligations, Competency, and PPE

Before mobilization, the Contractor must submit a site-specific OHS plan covering the hazards particular to this site: excavation and working-at-height during substructure and superstructure works, electrical work during finishing and installation, and the proximity of MoAI staff, Kulmis Village residents, and Villa Hirshabelle to the site boundary. Personal protective equipment, helmets, gloves,

boots, high-visibility vests, and ear protection where noise levels warrant it, is mandatory for all workers within the site boundary, with no exceptions for short visits or casual tasks.

Competency requirements apply to specific roles rather than the workforce generally: workers undertaking excavation and formwork must have demonstrable prior experience, and any electrician working on the building's electrical installation must be licensed or otherwise independently verifiable as competent, given the electrical-hazard risk identified in Table 1. The Contractor must maintain training and competency records for these roles and make them available to the Supervising Engineer on request.

- Daily toolbox talks before each shift, covering that day's specific tasks and hazards rather than generic safety messaging.
- A weekly OHS session covering a broader topic — heat-stress management, manual handling, or electrical safety — rotating through the main hazard categories over the construction period.
- Shaded rest areas, drinking water, and adjusted working hours during peak heat, given Jowhar's semi-arid climate described in Section 3.1.
- An accident and near-miss log maintained by the Contractor, with root-cause analysis for any incident beyond first-aid severity, reviewed by the Supervising Engineer.
- A basic site emergency plan covering first aid, evacuation, and emergency contacts, adapted to the reality that the site sits within a flood-exposed riverine district rather than an inland construction ground, and near a government-institutional cluster.

8.5 Codes of Conduct, Including SEA/SH Provisions

Every worker, whether directly employed, subcontracted, or engaged as site security, must sign a Code of Conduct before starting work, setting out expected standards of behavior on site and toward Kulmis Village and the wider Jowhar District community. Violations, including harassment, exploitation, intimidation, or substance use while on duty, are grounds for disciplinary action up to and including dismissal.

The Code of Conduct must include explicit SEA/SH provisions: a prohibition on any worker using their position to solicit or pressure a community member into a sexual relationship, mandatory SEA/SH awareness training before mobilization, and a clear statement that survivors will be referred to appropriate support services rather than left to raise the matter informally. Awareness training and Code of Conduct signature should be treated as a precondition of site access, not a formality completed after work has already begun.

8.6 Worker Grievance Channels

A worker-facing grievance channel, distinct from the general community Grievance Mechanism described in Section 10, must be established and communicated to every worker at induction. This channel must allow workers to raise concerns about pay, conditions, treatment, or safety without fear of retaliation, including an option to raise a complaint anonymously. SEA/SH complaints follow the separate confidential, survivor-centred pathway described in Section 8.5 and Section 10.3, rather than

the general worker channel, given the sensitivity involved. All complaints, of either type, should receive an acknowledgment within three working days and a documented resolution or referral.

8.7 Incident Reporting Lines

Labor and OHS incidents follow a defined reporting line, tailored to Hirshabelle's two-tier institutional structure (Section 4.3), so that a serious incident on site reaches NPCU quickly enough to matter.

Table 4: Labor and OHS Incident Reporting Lines

Level	Trigger / Report Type	Reported To	Timeframe
Contractor site supervisor	Fatality or serious injury (lost-time incident)	Hirshabelle SESSCO/SPCU, then NPCU	Immediately, within 24 hours
Contractor site supervisor	Minor injury or near-miss	Supervising Engineer (weekly log)	Logged same day; reported weekly
Supervising Engineer	Weekly OHS and labor inspection summary	Hirshabelle SESSCO	Weekly
Hirshabelle SESSCO/SPCU	Consolidated E&S and labor performance report	NPCU	Monthly
Any worker (direct, contracted, or community)	Worker grievance or SEA/SH complaint	Worker GM focal point; SEA/SH pathway for sensitive complaints	Continuous; acknowledged within 3 working days

This reporting cadence follows standard Moderate-risk practice (Section 5.1) and should be treated as a floor rather than a ceiling: the Supervising Engineer, Hirshabelle SESSCO, and NPCU may reasonably increase inspection or reporting frequency during substructure and superstructure works specifically, where Table 1 identifies the highest concentration of Substantial-rated OHS risks on their own merits.

8.8 Monitoring and Documentation

The Contractor is responsible for maintaining, and making available on request, a labor register, signed contracts, age-verification records, signed Codes of Conduct, toolbox-talk attendance sheets, the accident and near-miss log, and the worker GM log. The Supervising Engineer verifies these records during weekly site inspections, and the Hirshabelle SESSCO conducts a monthly labor and OHS audit consistent with Table 4 and Table 7, with results consolidated into the reporting described in Section 8.7. Gaps identified during any inspection or audit should be tracked to closure through a corrective-action log, rather than noted once and left unresolved.

9. Stakeholder Engagement and Public Consultation

This section describes the stakeholder engagement carried out for the Hirshabelle MoAI Office Sub-project, consistent with the Stakeholder Engagement Plan (SEP) of the Somalia Food Systems Resilience Project. It identifies the stakeholders relevant to this sub-project, sets out the engagement undertaken to date and planned ahead, and specifies how women and vulnerable groups are being reached in Kulmis Village and the wider Jowhar District.

The primary beneficiaries of this sub-project are Hirshabelle MoAI staff, who gain a functional headquarters after operating from constrained premises since 2015, and, more broadly, the agro-pastoralist and farming communities across Hirshabelle State who rely on the Ministry's programming and coordination capacity.

9.1 Objectives of Stakeholder Engagement

Engagement for this sub-project is intended to:

- Provide timely and accessible information on the sub-project's design, timeline, and expected benefits and risks to Hirshabelle MoAI staff, Jowhar District authorities, and Kulmis Village residents.
- Secure the informed views and concerns of MoAI staff, District Administration, and community representatives before and during construction.
- Confirm the accuracy of baseline social data, including the presence and needs of women, youth, IDP households, and minority groups in Kulmis Village.
- Establish a documented basis of support from Jowhar District Administration and the Kulmis Village community, consistent with the land donation already secured (Section 1.1) and the security coordination role described in Section 7.6.
- Link stakeholders to the project Grievance Mechanism (GM) for the duration of construction and operation.

9.2 Stakeholders Identified

The stakeholder groups relevant to this sub-project, together with their principal interest and the engagement approach applied to each, are summarized in Table 5.

Table 5: Stakeholders Identified.

Stakeholder Group	Interest / Relevance	Engagement Approach
Hirshabelle MoAI staff	Primary beneficiaries; current and future occupants of the building	Direct engagement throughout preparation and construction
Jowhar District Commissioner and Mayor's Office	Land donor; local governance, access, and security coordination authority	Direct engagement throughout preparation; ongoing coordination during construction

Stakeholder Group	Interest / Relevance	Engagement Approach
Kulmis Village community representatives	Immediate neighbors of the site; affected by construction activity and site security arrangements	Group consultation; targeted sessions for women, youth, and IDP households
Women representatives (MoAI staff and Kulmis Village)	Distinct access, safety, and participation considerations	Targeted engagement to ensure participation is not limited by mixed-group dynamics
Youth representatives	Potential construction employment interest	Included in general and targeted consultation sessions
Internally displaced persons (IDP) households	Present in Kulmis Village; access and inclusion considerations	Included directly in consultation; continued inclusion in ongoing engagement
Hirshabelle SPCU and SESSCO	State-level implementation and safeguards oversight	Continuous engagement throughout the sub-project cycle
NPCU	National project coordination and safeguards oversight	Continuous engagement throughout the sub-project cycle

9.3 Engagement Undertaken

A High-Level Project Kick-off and Safeguarding Briefing Meeting was held on 11 July 2026 at the MoAI Office, Kulmis Village, Jowhar District. Twelve Hirshabelle MoAI staff attended (10 male, 2 female), introducing the sub-project scope, timeline, and World Bank ESF requirements. The full meeting minutes and attendance record are provided in Annex 4 of this ESMP.

A follow-up site visit to the donated Kulmis Village parcel was conducted on 27 July 2026, confirming the site boundaries and readiness of the land ahead of mobilization. Photographs from both engagements are provided in Annex 5.

Consultation was subsequently extended beyond MoAI staff: a Stakeholder Engagement Meeting with community members and government officials was held on 26 July 2026 at Kulmis Village, discussing project scope, environmental and social safeguards, local hiring, GBV/SEA/SH prevention, and the Grievance Redress Mechanism. Stakeholders expressed full support for the project, with no disagreements raised. The consultation record and attendance register are provided in Annex 4, and photographs in Annex 5.

Four outcomes from these engagements are of particular relevance to this ESMP:

- **District Administration support:** MoAI staff confirmed that Jowhar District Administration has warmly welcomed the proposed office construction under S-FSRP, consistent with its formal land donation (Section 1.1) and its ongoing security and access coordination role (Section 7.6).
- **Staff input and gender considerations:** Ministry staff provided direct feedback on the office design, and specific accommodations for women staff members were incorporated, including separate, adequately provisioned sanitary facilities on each floor (Annex 3) and confirmation that the Minister's, Deputy Minister's, and Director General's facilities do not compromise shared staff workspace.

- **Community and safeguards feedback:** discussion covered site safety during construction, prioritization of local hiring from Kulmis Village and Jowhar District (Section 8.3), and flood risk management given the site's location within the Shabeelle River floodplain (Section 3.1, Table 2 Row 26).
- **Wider community and government official support:** the 26 July 2026 Stakeholder Engagement Meeting confirmed broad community and government support for the project, with requests for prioritized local hiring, dust/noise/waste controls, traffic and site-safety management, equal employment opportunities for women and youth, and a simple, accessible, confidential Grievance Redress Mechanism (Annex 4).

9.4 Summary of Consultation Activities

Table 6: Summary of Consultation Activities

Date	Stakeholder Group	Location	Purpose
11 July 2026	Hirshabelle MoAI staff (12 attendees: 10 male, 2 female)	MoAI Office, Kulmis Village, Jowhar District	High-Level Project Kick-off and Safeguarding Briefing Meeting: formal introduction of the sub-project scope and timeline; overview of World Bank ESF requirements; District Administration support noted; staff design input including gender-specific accommodations; discussion of site safety, local hiring, and flood risk management.
27 July 2026	Hirshabelle MoAI officials and site representatives	Donated parcel, Kulmis Village, Jowhar District	Site visit confirming boundaries and readiness of the donated land ahead of mobilization.
26 July 2026	Community members, elders, women, youth, and government officials	Kulmis Village, Jowhar District	Stakeholder Engagement Meeting with community members and government officials: project overview, environmental and social risks and safeguards, local hiring, GBV/SEA/SH prevention, and Grievance Redress Mechanism; broad support expressed, no disagreements raised.

Detailed points raised by participants and the responses provided are recorded in the meeting minutes and attendance sheet appended in Annex 4.

9.5 Reaching Women and Vulnerable Groups

Given the social context described in Section 3.2, women's participation in mixed-group settings can be limited by norms around who speaks in front of whom. Two of the twelve attendees at the 11 July 2026 meeting were women, whose direct input shaped the gender-specific design accommodations noted in Section 9.3; continued targeted sessions with women, youth, and IDP (if found) representatives in Kulmis Village are planned as engagement extends beyond MoAI staff to the wider community (Section 9.6).

Kulmis Village community representatives, including women, youth, and IDP households linked to recurring river flooding (Section 3.2), had previously been consulted during earlier FSRP flood

protection assessments conducted by FAO, but were not yet directly consulted as part of this sub-project as of the 11 July 2026 and 27 July 2026 engagements, both of which were MoAI-internal or site-based. This gap was addressed through the Stakeholder Engagement Meeting with community members and government officials held on 26 July 2026 at Kulmis Village (Section 9.3; Annex 4), which included group discussions and individual interviews with government officials, elders, women, and youth. Continued targeted sessions, as described in Section 9.6, remain planned to sustain this inclusion through subsequent project phases.

9.6 Ongoing and Future Engagement

Engagement will continue through the construction, commissioning, and operational phases of the sub-project. This includes:

- Advance notice to Hirshabelle MoAI staff and Kulmis Village residents of construction mobilization dates and any temporary access restrictions.
- Periodic briefings during construction on progress, safety measures, and expected completion timelines.
- Targeted sessions with women, youth, and IDP representatives in Kulmis Village to sustain inclusive participation.
- Continued coordination with Jowhar District Administration on security and access matters (Section 7.6).
- Access to the project Grievance Mechanism (GM) at all stages, including the GBV/SEA/SH-specific reporting pathway, publicized through the same channels used for general consultation.

9.7 Documentation and Disclosure

Consistent with the SEP, records of all consultation activities, including meeting minutes, attendance sheets, and photographic documentation, are maintained and appended to this ESMP. The meeting minutes and attendance records for the 11 July 2026 and 26 July 2026 consultations are provided in Annex 4. Any material change in stakeholder position, including newly raised concerns, will be reported to the Hirshabelle SPCU and NPCU as part of routine sub-project monitoring.

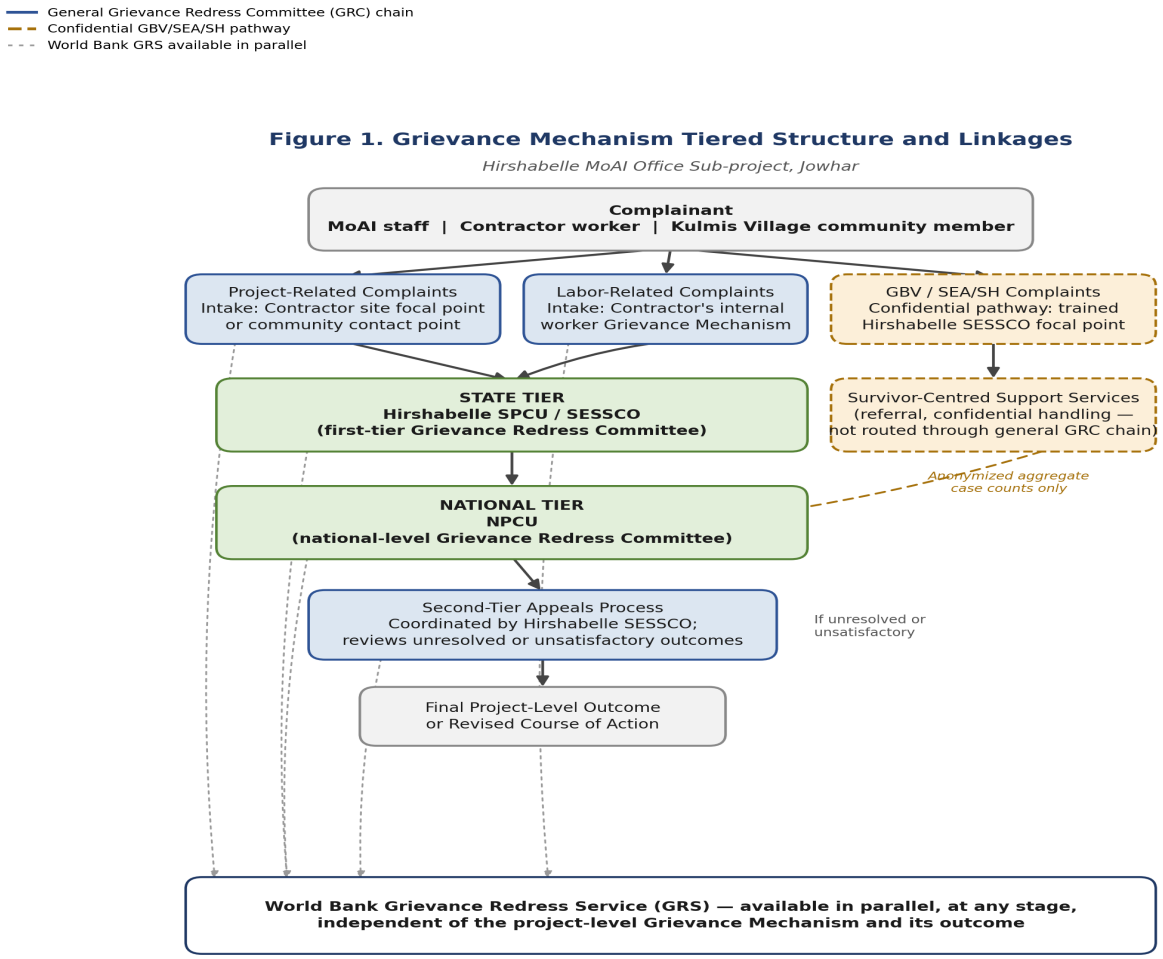
10. Grievance Mechanism

This section describes the Grievance Mechanism (GM) that applies to this sub-project, consistent with the S-FSRP Grievance Mechanism arrangements set out in the PIM, the SEP, and the LMP. Following World Bank practice as reflected in the PIM, the GM makes four distinct categories of complaint: project-related complaints, GBV/SEA/SH complaints, labor-related complaints, and second-tier or escalated complaints. Each follows its own process, but all feed into the same institutional structure of community, state, and national Grievance Redress Committees (GRCs). Because Hirshabelle is a Federal Member State, the community-level GRC escalates first to the Hirshabelle SPCU/SESSCO before reaching NPCU (Section 4.3), unlike the single-tier, NPCU-direct arrangement applicable to the comparable Mogadishu and Dayax sub-projects in Banadir Region.

10.1 Tiered Structure and Linkages

Figure 1 sets out how a complaint raised by MoAI staff, a contractor worker, or a Kulmis Village community member moves through the GM, from initial intake to resolution or escalation, and how the three complaint-type pathways relate to one another and to the state and national GRC structure.

Figure 1: GM Tiered Structure & Linkages



10.2 (a) Project-Related Complaints

Project-related complaints — concerns about construction disruption, flooding-related disruption, or the conduct of the works generally — are handled through the standard GRC structure. The first point of contact is the Contractor's site focal point or a community contact point in Kulmis Village, supported by a GM focal point who logs the complaint and attempts resolution directly. If unresolved at this level, or if the complainant is dissatisfied with the outcome, the complaint moves to the Hirshabelle SPCU/SESSCO as the state-tier GRC and, if still unresolved, to NPCU's national-level GRC. The Hirshabelle SESSCO and NPCU review the caseload jointly on a quarterly basis, consistent with the PIM's oversight arrangements, so that patterns, not just individual cases, are visible at both the state and national level.

10.3 (b) GBV/SEA/SH Complaints

Complaints relating to gender-based violence, sexual exploitation and abuse, or sexual harassment follow a separate, survivor-centred process from the moment they are received, even though they may enter through the same community-based intake points described in Section 10.6. Rather than being logged and progressed through the general GRC chain, these complaints are routed directly to the Hirshabelle SESSCO's trained GBV/gender specialist focal point, who manages the case directly and arranges referral to appropriate support services. Case details are not shared up the general reporting chain; only anonymized, aggregate figures, for example, the number of cases received and resolved in a period, are reported to NPCU for monitoring purposes, consistent with the confidentiality principle underpinning this pathway.

10.4 (c) Labor-Related Complaints

Complaints from project workers about pay, conditions, treatment, or safety are raised through the Contractor's internal worker GM described in Section 8.6, rather than the general community-facing GRC chain, since these are first and foremost an employer-employee matter governed by the LMP. If a labor complaint is not resolved internally by the Contractor, it escalates to the Supervising Engineer, then to the Hirshabelle SESSCO/SPCU, and then to NPCU, following the same reporting line set out in Section 8.7. A labor complaint that also involves SEA/SH follows the confidential pathway in Section 10.3 instead of the general worker GM, regardless of the fact that both parties are project workers.

10.5 (d) Second-Tier and Escalated Complaints

Where a complaint cannot be resolved by the first-tier channels above, or is not resolved to the complainant's satisfaction, it moves to a second-tier appeals process coordinated by the Hirshabelle SESSCO. This process draws on a grievance-handling committee that reviews the case, the steps already taken, and the reasons resolution was not reached, and determines a final project-level outcome or a revised course of action. Availability of this appeals process does not prevent a complainant from pursuing judicial or other administrative resolution mechanisms at any point, and the World Bank's Grievance Redress Service (GRS) remains available in parallel for all World Bank-financed activities, independent of whether the project-level GM has been used or has reached a conclusion.

10.6 Access for Dispersed Rural Stakeholders

A significant share of the Ministry's stakeholders — agro-pastoralist and farming communities across Hirshabelle State's districts who engage with MoAI programming, and Kulmis Village residents who may have limited literacy or phone access — will not visit the Jowhar office regularly. A GM design that assumes a complainant can simply return to the office to check on their case will not reach this group. Several features of the GM are specifically intended to close that gap:

- Immediate, on-the-spot intake: a complaint can be lodged verbally at the time of contact, through the complaint box, or directly to the Contractor's site focal point or a community contact, without requiring a written submission.
- Phone-based follow-up: a complainant is given a reference number and a phone contact at the time of intake, so that status can be checked by phone rather than requiring a return visit.
- Verbal and Somali-language access throughout: no complaint should be turned away or delayed for want of a written submission in a particular language.
- Proxy submission: a community member unable to follow up personally may authorize a relative or community representative to pursue the complaint on their behalf.

These features should be treated as core design requirements for this sub-project's GM, not optional refinements, since without them the mechanism functions well for MoAI staff and nearby residents but effectively excludes dispersed rural stakeholders across Hirshabelle State.

10.7 Documentation, Reporting, and Review

GM logs are maintained at each level: the Contractor for worker complaints, the community-level focal point for general complaints, and the Hirshabelle SESSCO and NPCU for complaints that reach those tiers. SEA/SH case logs are maintained separately and more restrictively, accessible only to the designated GBV/gender specialists, consistent with Section 10.3. The Hirshabelle SESSCO and NPCU review the overall caseload jointly on a quarterly basis, and this review should be read alongside the heightened supervision applied to substructure and superstructure works specifically (Section 5.1), so that a spike in complaints during that phase is picked up promptly rather than waiting for the next scheduled quarterly review.

11. Monitoring and Reporting

This section sets out the indicators, methods, frequency, and responsible party for monitoring this sub-project across its construction and operation phases, consolidated into a single table covering structural and flood-resilience performance, OHS, waste management, labor conditions, stakeholder engagement and grievance resolution, community safety, and security.

Table 7: Monitoring and Reporting Plan.

#	Monitoring Aspect	Indicator	Method / Tool	Frequency	Responsible Party
1	ESMP / C-ESMP Implementation	Approved C-ESMP in place; E&S clauses included in contract	Document review	Prior to mobilization	Hirshabelle SPCU/SESSCO
2	Structural Quality and Flood Resilience	Supervising Engineer sign-off at each construction stage; as-built conformity with design	Site inspection; as-built records	At each construction stage; annual inspection during operation	Supervising Engineer; NPCU
3	Drainage Performance (Operation)	Presence or absence of standing water around the building after rainfall	Visual inspection with photographic record	After rainfall events; weekly during Gu/Deyr seasons	MoAI; Hirshabelle SPCU
4	OHS Incidents	Number of lost-time injuries, fatalities, and near-misses	Accident/incident log	Continuous; immediate report of any LTI or fatality	Contractor; Supervising Engineer
5	PPE Compliance and Toolbox Talks	PPE compliance rate; toolbox-talk attendance rate	Site inspection checklist; attendance sheets	Weekly (PPE); daily logging, monthly summary (toolbox talks)	Contractor; Supervising Engineer
6	Waste Management Compliance	Number of waste-segregation non-compliances; confirmation of approved disposal site use	Site inspection checklist; disposal records	Weekly; monthly reporting	Contractor; Supervising Engineer
7	Labor Conditions	Percentage of workers with signed contracts and verified age (18+); Code of Conduct signature rate	Labor register review; CoC records	Continuous record-keeping; monthly audit	Contractor; Hirshabelle SESSCO
8	GBV / SEA / SH	Number of cases received and resolved (anonymized, aggregate); awareness-session completion rate	Confidential case log; training attendance records	Continuous; monthly review	Hirshabelle SESSCO
9	Stakeholder Engagement and Grievance Mechanism	Number of consultations held versus planned; grievances received by category; percentage resolved within target timeframe	Consultation attendance sheets; GM register	Weekly during construction; monthly GM review	NPCU; Hirshabelle SPCU

#	Monitoring Aspect	Indicator	Method / Tool	Frequency	Responsible Party
10	Second-Tier Escalations	Number of complaints escalated to the second-tier appeals process	Case-tracking log	Quarterly	Hirshabelle SESSCO
11	Community Safety	Number of community health and safety incidents; functional status of fencing and signage	Incident log; site inspection checklist	Continuous logging; daily site check, weekly formal inspection	Contractor; Supervising Engineer
12	Security	Number of security incidents given proximity to Villa Hirshabelle	Incident log	Continuous; monthly security review	Contractor; NPCU/SPCU; Hirshabelle State security authorities
13	Traffic and Road Safety	Adherence to agreed material-transport timing and routes	Coordination record with Jowhar District authorities	Continuous during mobilization and civil works	Contractor; Hirshabelle SPCU
14	Utility Reliance (Operation)	Functional status of backup generator and water storage, given reliance on privately-provided services	Facilities inspection checklist	Monthly during operation	MoAI
15	Cultural Heritage / Chance Finds	Number of chance-find incidents reported	Incident reporting form	Continuous; activated only if triggered	Contractor; NPCU

Monitoring thresholds for structural and drainage performance (Row 2 and Row 3) will be finalized following the geotechnical and flood-elevation survey referenced in Table 2, so that monitoring from commissioning onward is measured against site-specific design parameters rather than general assumptions.

12. Implementation Budget and Schedule

This section sets out the indicative budget and schedule for implementing this ESMP, phased against the sub-project's construction timeline. The total ESMP implementation cost is confirmed at USD 75,000, equal to the agreed 5 percent of the total sub-project construction budget. The cost breakdown below follows the standard structure used across comparable World Bank-financed ESMPs (component, cost, share, responsible party, and timeframe), rather than a bespoke format, so it reads consistently with what a reviewer would expect to see.

12.1 Basis of the ESMP Budget

The total cost of implementing this ESMP is USD 75,000, equal to 5 percent of the total sub-project construction budget, consistent with the planning basis provided for this document. All items in Table 8 are costs that fall within the Contractor's Bill of Quantities (BOQ), meaning they are priced, tendered, and paid for as part of the works contract, rather than as a separate parallel budget line sitting outside procurement. Costs associated with NPCU's and the Hirshabelle SPCU/SESSCO's own supervision and safeguards functions (Section 7) are carried under their respective project management budgets and are not part of the USD 75,000 figure addressed here.

12.2 ESMP Cost Allocation

Table 8: ESMP Cost Allocation.

ESMP Component	Cost (USD)	% Share	Responsible Party (BOQ)	Timeframe
Environmental safeguards (flood-resilient foundation QA, drainage inspection, dust/erosion control, chance-finds procedure)	$22,500	30%	Contractor (BOQ); Supervising Engineer (verification)	Substructure & Superstructure
Occupational Health and Safety (PPE, toolbox talks, first aid, emergency plan)	$9,000	12%	Contractor (BOQ)	Construction (all phases)
Community health, safety, and security (fencing, signage, Traffic Management Plan, security coordination)	$13,500	18%	Contractor (BOQ); Jowhar District Authority (coordination)	Mobilization – Commissioning
Labor management and SEA/SH (Code of Conduct, awareness training, worker GM setup)	$7,500	10%	Contractor (BOQ); Hirshabelle SESSCO (trainer identification)	Pre-construction & Construction
Stakeholder engagement and community-facing Grievance Mechanism	$6,000	8%	Contractor (BOQ); Hirshabelle SPCU (channel management)	All phases
Waste management and site restoration (segregation, disposal, vegetation protection, reinstatement)	$7,500	10%	Contractor (BOQ)	Construction
Monitoring and reporting (structural/drainage inspections, reporting)	$6,000	8%	Contractor (BOQ); Hirshabelle SESSCO (oversight)	Operation (ongoing)
Contingency (chance-finds procedure, miscellaneous compliance buffer)	$3,000	4%	Contractor (BOQ, contingency)	As triggered

ESMP Component	Cost (USD)	% Share	Responsible Party (BOQ)	Timeframe
Total	**$75,000**	**100%**		

The allocation above is this ESMP's proposed weighting across mitigation categories, not a costed estimate from the Contractor or Supervising Engineer. Environmental safeguards and community health, safety, and security carry the largest shares, consistent with the flood and security risk profile identified in Table 1. It should be reviewed and adjusted once the Contractor prices actual quantities during BOQ preparation, rather than adopted as final.

12.3 Implementation Schedule

The ESMP's implementation follows the sub-project's overall 8-to-12-month construction timeline (Section 2), with environmental safeguards and OHS measures active from mobilization, community health, safety, and security measures sustained through commissioning, and monitoring and reporting continuing into the operation phase once the building is handed over to Hirshabelle MoAI.

13. References

- World Bank. *Environmental and Social Framework (ESF)*. 2018.
- World Bank Group. *General Environmental, Health, and Safety (EHS) Guidelines*. 2007.
- Somalia Food Systems Resilience Project (S-FSRP). *Project Implementation Manual (PIM)*, June 2023 version, cleared by the World Bank.
- Somalia Food Systems Resilience Project (S-FSRP). *Environmental and Social Management Framework (ESMF)*.
- Somalia Food Systems Resilience Project (S-FSRP). *Stakeholder Engagement Plan (SEP)* and *Labor Management Procedures (LMP)*.
- Federal Government of Somalia, Ministry of Energy and Water Resources. *Comprehensive Assessment for Flood Mitigation in Jowhar*. March 2022.
- United Nations Population Fund (UNFPA). Population estimates for Jowhar District and Middle Shabelle Region, 2014 survey, with subsequent regional estimates to 2024.
- Provisional Constitution of the Federal Republic of Somalia.
- Somalia Environmental Protection and Management Act (2024); Environmental and Social Impact Assessment and Audit Regulations (2024); Somali Labour Code (2024); Somalia National Gender Policy (2016); Construction Permits Act (2022).

Annexes

Annex	Title
Annex 1	Environmental and Social Screening Document
Annex 2	Land Donation Letter and Official Confirmation of Land Allocation
Annex 3	Drawings & Site layout
Annex 4	Stakeholder Consultation Notes and Attendance (11 July and 26 July 2026)
Annex 5	Photographs

Annex 1: Environmental and Social Screening Document

Sub-projects under S-FSRP are screened for their inherent environmental and social risks regardless of planned mitigation and management measures. This means risks are identified as if no mitigation or management measures were to be put in place, consistent with the parent ESMF's screening methodology. The screening below draws on the facts established in Sections 1–3 and the risk register in Table 1.

Section A: General Information

Field	Detail
Date of screening	11 July 2026
Activity / Sub-project title	Construction of the Hirshabelle State Ministry of Agriculture and Irrigation (MoAI) Office, Kulmis Village, Jowhar District
Activity / Sub-project component	Component 4: Promoting a Greater Focus on Food Systems Resilience in National and Regional Policy Making — Sub-component 4.1: Ministerial Capacity Building and Agri-food Policy Assessments for the Crops Sector (Section 1.2)
Implementing partner	Hirshabelle State Ministry of Agriculture and Irrigation (MoAI), through the Hirshabelle State Project Coordination Unit (SPCU)
Proposed activity budget	See Section 12 — ESMP implementation cost of USD 75,000, equal to 5% of the total sub-project construction budget
Proposed activity duration	8–12 months (Section 2)
E&S Screening Team Leader and Contact Details	Mahad Ahmed Hilowle, environmental specialist, email: mahadtika@gmail.com. Tell: +252 618288210, Environmental Safeguards Specialist.
E&S Screening Team Members	Mahad Ahmed Hilowle — NPCU Env. Safeguards Specialist, Hirshabelle Environmental Safeguard Specialist; Mohamud Abdirahman Osman - NPCU Soc. Safeguard Specialist
Site / Activity location	Kulmis Village, Jowhar District, Hirshabelle State (2°49'40.0"N, 45°30'57.8"E)
New / Rehabilitation project	New
Project description	Construction of a Ground+2 (G+2) reinforced concrete office building for Hirshabelle MoAI, comprising approximately fourteen offices, a central meeting hall, and dedicated Minister, Deputy Minister, and Director General facilities, on a 4,000 m² parcel donated by Jowhar District authorities (Section 2).
Environmental and Social Risk Classification (ESF)	Moderate Risk

Section B: Potential Environmental and Social Risks and Impacts

Risk Category (Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	I d on't know	If these risks ('yes') are present, refer to:	Comments
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is an Environmental and/or Social Assessment required where project is undertaken?	Yes			ESMF	A site-specific Environmental and Social Management Plan (ESMP) will be prepared and implemented for the MoAI HQ project in accordance with the Somalia FSRP ESMF and applicable World Bank Environmental and Social Standards. The ESMP will address construction and operational-phase risks and mitigation measures. A site-specific **Environmental and Social Management Plan (ESMP)** for the MoAI HQ office block, including measures for construction and operational phases, to be disclosed and consulted upon prior to commencement of works; and – A **Contractor's Environmental and Social Management Plan (C-ESMP)** to be prepared by the civil works contractor, aligned with the ESMP, the Labor Management Procedures (LMP), the GBV/SEAH Action Plan, and the World Bank Group General Environmental, Health and Safety (EHS) Guidelines. The ESMP requirements, including relevant E&S clauses, will be incorporated into the

					bidding documents and the construction contract and will be supervised throughout implementation.
Is there a risk of diversion of project benefits?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity?		No		Security Management Plan (SMP)	
Is there a risk that project benefits may not reach truly vulnerable populations?		No		Stakeholder Engagement Plan (SEP)	
Is there a risk that the activity will cause population influx from neighboring areas?		No		Stakeholder Engagement Plan (SEP)	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?		No		Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
ESS 2: Labour and Working Conditions					
Does the activity include any of the known labor rights / ESS 2 non-compliance risks in Somalia (child and forced labor)?	Yes			Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include a construction component?	Yes			Labor Management Procedures (LMP) C-ESMP Occupational Health and Safety Plan (OHS)	
Does the activity include labor-intensive manufacturing?		No		Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include primary agricultural activities?		No		Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	

Will the activity require a larger contractor workforce?	Yes			Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for Project Workers?		No		Security Management Plan (SMP)	
Is there a risk of lacking OHS for workers at the construction site?	Yes			Occupational Health and Safety Plan (OHS) Pest Management Plan (PMP)	
Is there a risk of delayed payment of workers?		No		Labor Management Procedures (LMP)	In Somalia, both skilled and unskilled laborers are typically hired as casual workers and are paid on a daily basis. As a result, there is generally no risk of delayed payments.
Is there a risk that workers are underpaid?		No		Labor Management Procedures (LMP)	
Is there a risk that women will not be included in deployment in equal numbers?	Yes			Labor Management Procedures (LMP) GBV Action Plan	Since this is construction work, which is physically demanding, it is traditionally considered a male-dominated activity in Somalia. Culturally, women are not commonly involved in heavy labor but may participate in lighter tasks such as watering, preparing food, and other supportive roles.
ESS 3: Resource Efficiency and Pollution Prevention Management					
Will the activity result in the production of solid waste? (directly by the	Yes			Waste Management Plan, based on WBG Environmental,	The project will generate typical construction-related solid waste, including excavated soil, packaging materials,

project or by workforce)				Health, and Safety General Guidelines Pest Management Plan (PMP) C-ESMP	scrap and domestic waste. The contractor will implement a Waste Management Plan (WMP) under the ESMP/C-ESMP covering segregation, storage, reuse/recycling where feasible, transport and safe disposal at approved facilities.
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceutics, industrial chemicals, ozone depleting substances)	Yes				Hazardous waste may include used oils, paints, solvents, sealants and contaminated materials. These materials will be safely stored, handled, segregated and disposed of through appropriate facilities in accordance with the WMP and ESMP/C-ESMP.
Will the activity result in the generation of dust an noise?	Yes			C-ESMP	
Will the activity result in soil erosion?		No		C-ESMP	
Will the activity produce effluents? (waste water)?	Yes			C-ESMP Waste Management Plan	Limited wastewater will be generated from workers and sanitation facilities. Wastewater will be managed through properly designed sanitation and drainage systems in accordance with applicable national requirements and the ESMP/C-ESMP.
Will the activity result in increased levels of vibration from construction machinery?	Yes			C-ESMP	
Will the project produce air pollution? (e.g. significant greenhouse gas emissions, dust emissions and other sources)	Yes			C-ESMP	
Will the activity disturb any fauna and flora?		No		C-ESMP	
Will the activity result in irrigation water with high TDS		No		C-ESMP	

with more than 1,500 ppm?				Waste Management Plan	
Can the project affect the surface or groundwater in quantity or quality? (e.g. discharges, leaking, leaching, boreholes, etc.)		No			
Will the project require use of chemicals? (e.g. fertilizers, pesticides, paints, etc.)	Yes				Construction will require limited use of chemical-containing products, including paints, oils, sealants and cleaning materials. Safe storage, handling, spill prevention and disposal requirements will be implemented through the ESMP/C-ESMP.
Is there any risk of accidental spill or leakage of material?	Yes				There is a potential risk of accidental spills or leakage from fuels, oils, paints and other construction materials. Appropriate storage, containment, spill-response and housekeeping measures will be implemented through the ESMP/C-ESMP.
ESS 4: Community Health and Safety					
Is there a risk of community exposure to pesticides?		No		Pest Management Plan (PMP)	**Community Health and Safety (ESS4)** The site is located in an urban setting adjacent to other public institutions and is therefore accessible to staff and visitors. Construction activities may temporarily increase risks to community health and safety due to

					movement of construction vehicles, open excavations, and the presence of machinery and materials. To mitigate these risks, the contractor will: – Secure the site with fencing and clear warning signage; – Implement traffic management measures in coordination with the municipality, including designated access routes, speed limits, and flag personnel where necessary; and – Maintain good housekeeping and safe storage of materials to avoid falling objects or obstructions to public movement. Although the labor influx is expected to be limited and primarily local, the subproject will implement measures proportionate to the risk to prevent **GBV/SEAH** and communicable disease transmission, in alignment with the project-wide

					GBV/SEAH Action Plan and SEP.
Is there a risk of communal drinking water pollution through pesticides?		No		Pest Management Plan (PMP)	
Is there a risk of increased GBV/SEAH cases due to labor influx?		No		GBV/SEAH Action Plan Labor Management Procedures (LMP)	
Is there a risk of spread of communal diseases due to labor influx?	Yes			Labor Management Procedures (LMP) C-ESMP	
Is there a security risk to the community triggered by project activities?		No		Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the activity include payments or cash transfers?	Yes			Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the activity expose community members to physical hazards on the project site?	Yes			C-ESMP	Construction may expose community members to physical hazards from open excavations, machinery, construction materials and site activities. The risks will be managed through fencing, warning signage, controlled access, safe storage and good housekeeping under the ESMP/C-ESMP.
Will the activity pose traffic and road safety hazards?	Yes			C-ESMP	Construction vehicles and deliveries may create temporary

					traffic and road-safety risks. Traffic management measures, designated access routes, speed limits and flag personnel where necessary will be implemented under the ESMP/C-ESMP.
Will the activity include debris removal that may pose a safety hazard for the community?	Yes			Waste Management Plan	
Is there a possibility that the activity contaminates open wells?		No		Waste Management Plan C-ESMP	
Is there a possibility that the activity spreads pathogens and other pollutants (eg latrines)	Yes			Waste Management Plan C-ESMP	
Can the activity contribute to the spread of disease (eg health facilities)?	Yes			Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	The land is owned by Hirshabelle State A due diligence review and site visit confirmed that the allocated parcel is vacant public land in Jowhar District, with no residents, informal settlers, structures, businesses or other users whose assets or livelihoods would be affected. Therefore, the subproject will not cause physical or economic displacement, and no Resettlement

					Action Plan (RAP) is required under ESS5. The land-allocation letters from the Jowhar District Administration and Hirshabelle MoAI are attached to the report.
Will the displacement / resettlement affect IDPs?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	Project is in the district of Jowhar
Would the project potentially discriminate against women and girls based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to disputes over land ownership?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to blocked access to people in the area?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity require acquisition of land or physical		No		Resettlement Policy Framework	No new land acquisition is required. The project

buildings or infrastructure?				(RPF) Resettlement Action Plan (RAP)	will be implemented on the existing public parcel formally allocated to the Ministry of Agriculture and Irrigation (MoAI).
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Are pesticides used in the activity likely to affect important natural resources or ecological functions?		No		Pest Management Plan (PMP)	
Will the activity impact sensitive areas?		No			
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?		No			
Is there a risk that the activity causes loss of precious ecological assets?		No			
ESS8: Cultural Heritage					
Although no cultural or religious sites were identified within or adjacent to the project area, **Chance Find Procedures** consistent with ESS8 will be included in the ESMP and incorporated into the construction contract. All workers will be trained on these procedures prior to excavation works.					
Are there known cultural/religious sites nearby?		No			No known sites identified within this area during screening.
Could excavation uncover chance finds?	Yes				. Although no cultural or religious sites were identified within or adjacent to the project area, excavation could potentially uncover previously unknown cultural heritage. Chance Find Procedures consistent with ESS8 will be included in the ESMP and incorporated into the construction contract. Relevant workers will be trained on these procedures before excavation works
ESS 10: Stakeholder Engagement and Information Disclosure					
Stakeholder Engagement and Information Disclosure (ESS10) Key stakeholders for this subproject include MoAI staff, neighboring public institutions (Regional Administration, Hirshabelle State House, Ministry of Education), the Jowhar District Municipality, and residents and businesses in the immediate vicinity of the project site. The screening visit involved the MoAI Hirshabelle team and municipal representatives.					

Further engagement with these stakeholders will be conducted during ESMP preparation and prior to commencement of works, in line with the **Somalia FSRP Stakeholder Engagement Plan (SEP)**. Information on the project, potential impacts, and mitigation measures will be disclosed in Somali language through appropriate channels. Project-affected people may submit complaints or feedback through the **Somalia FSRP Grievance Redress Mechanism (GRM)**, including at local government offices and MoAI/PIU channels. GRM contact details will be displayed at the construction site and in public notices.					
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as Community engagement activities?		No		Stakeholder Engagement Plan (SEP)	
Is there a historical exclusion of disabled persons in the area?		No		Stakeholder Engagement Plan (SEP)	
Is there a lack of social baseline data?		No		ESMF	
Is there a lack of community consultations by the government generally?		No		Stakeholder Engagement Plan (SEP)	
Are women likely to participate in decision-making processes in regards to the activity?	Yes			Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Is there a risk that the activity will have poor access to beneficiaries?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	

Section C: Summary of the Screening Process

Summary of Critical Risks and Impacts Identified

Risk / Impact	Risk Rating	Mitigation Reference
ESS1: Inadequate ESMP implementation	Moderate	Table 2, Row 1
ESS2: Labor and OHS hazards (falls, excavation, electrical)	Substantial (falls); Moderate (general)	Table 2, Rows 6–20
ESS2 / ESS4: GBV / SEA / SH	Substantial	Table 2, Row 18

Risk / Impact	Risk Rating	Mitigation Reference
ESS3: Site flood exposure	Moderate	Table 2, Row 26
ESS4: Security (proximity to Villa Hirshabelle)	Moderate	Table 2, Row 10
ESS5: Land acquisition	Minor / Not Applicable	Land Donation Letter (Annex 2)
ESS8: Chance finds	Moderate	Table 2, Row 28
ESS10: Stakeholder inclusion	Substantial	Section 9

Is Additional Assessment Necessary?

Screening result: Yes — a detailed Environmental and Social Management Plan (this document).

Justification: the screening identified multiple predictable environmental and social risks across ESS1, ESS2, ESS3, ESS4, ESS8, and ESS10 that are typical for a medium-scale construction sub-project, together with two site-specific considerations — Shabeelle River flood exposure and proximity to Villa Hirshabelle — that are addressed on their own terms in Sections 3, 5, and 6 rather than treated as generic risks. These impacts are site-specific, substantially manageable with the standard and site-tailored mitigation measures set out in Table 2, and do not involve involuntary resettlement, significant biodiversity impact, or unmanaged cultural heritage risk. A full Environmental and Social Impact Assessment (ESIA) is therefore not required. This ESMP, prepared by the Hirshabelle SPCU and SESSCO with NPCU technical support, is the appropriate instrument to guide risk management for the sub-project, consistent with the S-FSRP ESMF.

Annex 2: Land Donation Letter

The letter below (*Bixin Dhul*, TIX: DHJ/XGDDM/0114/2025, dated 04 August 2025) records the formal donation of a 100m × 40m (4,000 m²) parcel of public land in Kulmis Village, Jowhar District, by the Jowhar District Commissioner and Mayor's office to Hirshabelle MoAI, for construction of the sub-project described in this ESMP.



Jamhuuriyada Federalka Soomaaliya
Dowladda Hirshabelle
Dowladda Hoose ee Jowhar
Xafiiska Guddoomiyaha Degmada ahna Duqa magaalada Jowhar

جمهورية الصومال الفيدرالية
حكومة اقليم هرشبيلي
بلدية جوهر
مكتب محافظ المنطقة ورئيس بلدية جوهر

Federal Republic of Somalia
Hirshabelle State
Municipality of Jowhar
Office the District Commissioner and the Mayor of Jowhar

TIX: DHJ/XGDDM/0114/2025 TR: 04/08/2025

Ku: Ku: Wasaaradda beeraha iyo waraabka

OG: Xoghayaha Dowladda Hoose ee Degmada Jowhar

OG: Madaxweynaha Dowladda Hirshabeelle

Ujeedo: Bixin Dhul

Gudoomiyaha Degmada ahna Duqa Magaalada Jowhar

Markuu arkay: Baahida aay uqabaan Wasaaradda beeraha iyo waraabka Hirshabelle xarun aay ku shaqeeyaan.

Markuu arkay: sida aay muhiim utahay in Wasaaraddu hesho xarun aay bulshada ugu adeegto.

Markuu arkay: codsiga Wasiirka Wasaaradda beeraha iyo waraabka Hirshabelle.

Markuu latashaday: xubnaha kale ee Maamulka Degmada.

Gudoomiyaha Degmada ahna Duqa Magaalada waxuu cadeynaa in Dowladda Hoose ay bixisay dhul cabirkiisu dhanyahay 100×40 dhulkaas oo ku yaalo Xaafada Kulmis lana siiyay Wasaaradda beeraha iyo waraabka ee Dowladda Hirshabelle si loogu dhiso xarun bulshada loogu adeego.

Sidaasi darteed waxaa lagu wargelinaayaa cid kasto oo aay quseeyso warqadaan in aay sidaas ulasocdaan

Guddoomiyaha Degmada ahna Duqa Magaalada Jowhar
The District Commissioner and the Mayor of Jowhar
Osman Mohamed Mokhtar (Barey)

Jowhar Hirshabelle of Somalia Contact: +252615882088 Email: dc.mayor@jowhar.hs.so

In addition, the Ministry formally issued an Official Confirmation of Land Allocation (Ref: HSS/MOAI/031/2026, dated 21 June 2026), signed by the Minister of Agriculture and Irrigation. This letter reaffirms the Ministry's formal acceptance of the parcel referenced above, restates the site location, purpose, dimensions (40m × 100m) and boundaries, and confirms that the land will be used exclusively for public institutional activities of the Ministry, in accordance with the applicable laws and procedures of the Federal Republic of Somalia and Hirshabelle State.



Jamhuuriyada Federalka Soomaaliya
Dowladda Hirshabelle
Wasaaradda Beeraha iyo Waraabka
Xafiiska Wasiirka

الفيدرالية الصومال جمهورية
سبيلي هر حكومة
والري الزراعة وزارة
الـوزيـر مكتب

Federal Republic of Somalia
Hirshabelle State
Ministry of Agriculture and Irrigation
Office of the Minister

Ref: HSS/MOAI/031/2026 TR: 21/06/2026

Subject: Official Confirmation of Land Allocation

The Ministry of Agriculture and Irrigation (MoAI) of Hirshabelle State hereby officially confirms the allocation of a parcel of land located in Jowhar District, Middle Shabelle Region, for the construction, establishment and operation of the Ministry's headquarters, together with other related public service facilities.

This confirmation is issued based on the official land allocation granted by the Jowhar District Administration under Reference No. TIX: DHJ/XGDDM/0114/2025, dated 04/08/2025. Through this allocation, the Jowhar District Commissioner formally authorized the Ministry to utilize the designated parcel for the establishment of its official headquarters.

Location: Jowhar District, Middle Shabelle Region, Hirshabelle State.

Purpose: Construction and operation of the Ministry of Agriculture and Irrigation headquarter.

Dimensions: 40 metres × 100 metres.

Boundaries: - **North**: Regional Administration Building. **East**: Hirshabelle State House. **South**: Ministry of education and **West**: Road.

The Ministry of Agriculture and Irrigation (MoAI) formally accepts the allocated land for the stated governmental purpose. The property shall be used exclusively for public institutional activities of the Ministry and managed in accordance with the applicable laws, regulations, and administrative procedures of the Federal Republic of Somalia and Hirshabelle State.

This letter serves as the Ministry's official confirmation of its acceptance, interest in and intended use of the allocated land. The original land allocation letter issued by the Jowhar District Administration remains the primary supporting document defining the parcel boundaries and confirming the district's authorization.

Sincerely,

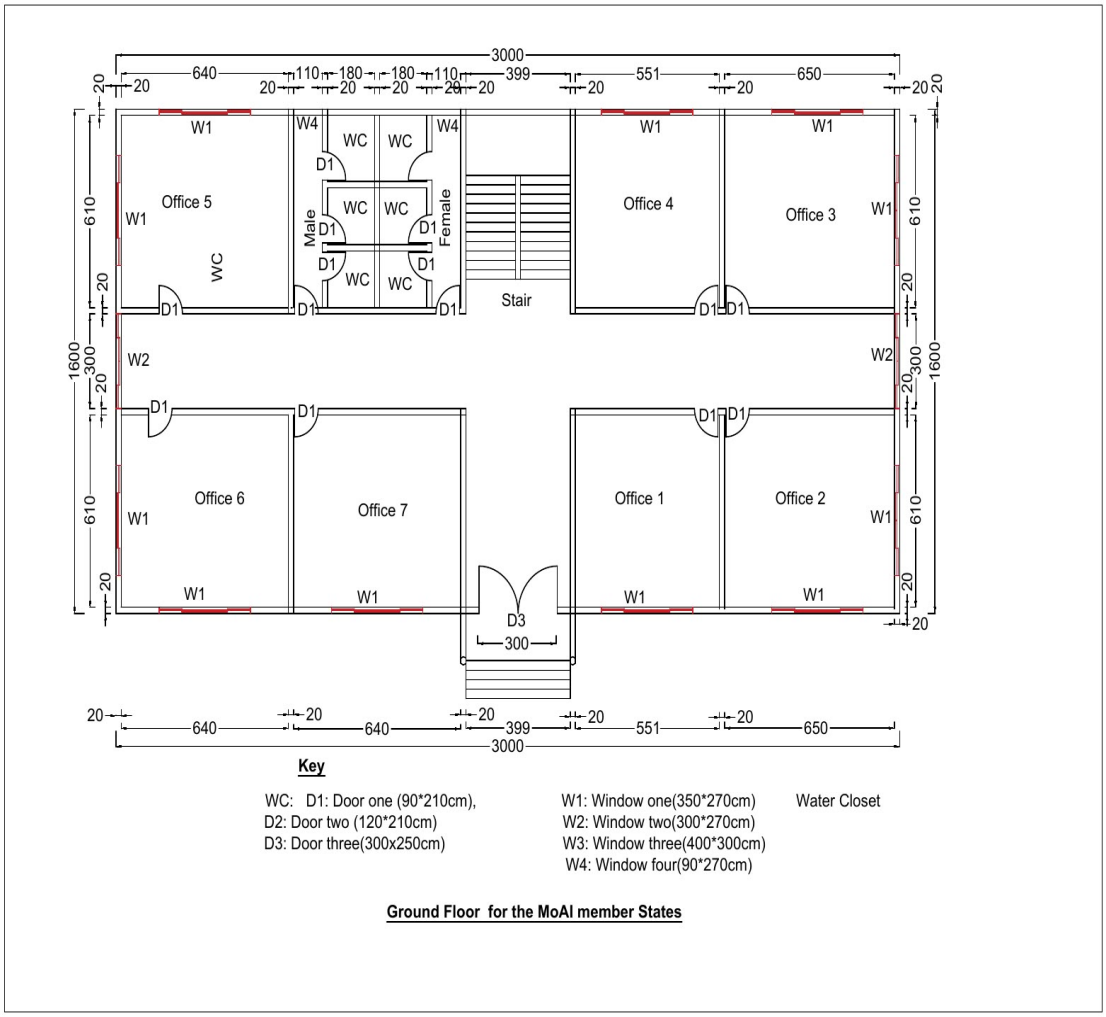
Hon. Mohamed Shiekh Mohamoud Yusuf
Minister of Agriculture & Irrigation
Hirshabelle state of Somalia

Address: jowhar, Hirshabelle State of Somalia
Email: minister@moa.hs.so Tell: +2526-612805484

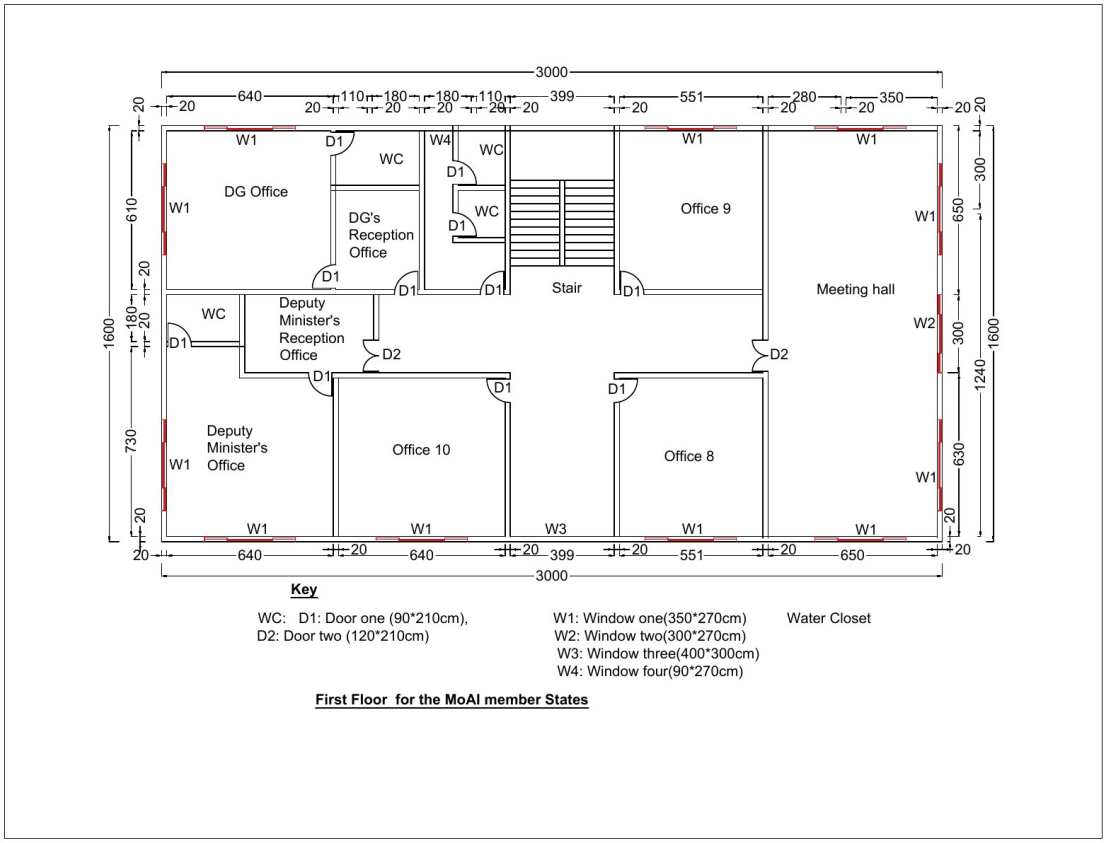
Official Confirmation of Land Allocation, Ref: HSS/MOAI/031/2026, dated 21 June 2026 (Hon. Mohamed Shiekh Mohamoud Yusuf, Minister of Agriculture & Irrigation, Hirshabelle State).

Annex 3: Drawings and Design of the Site

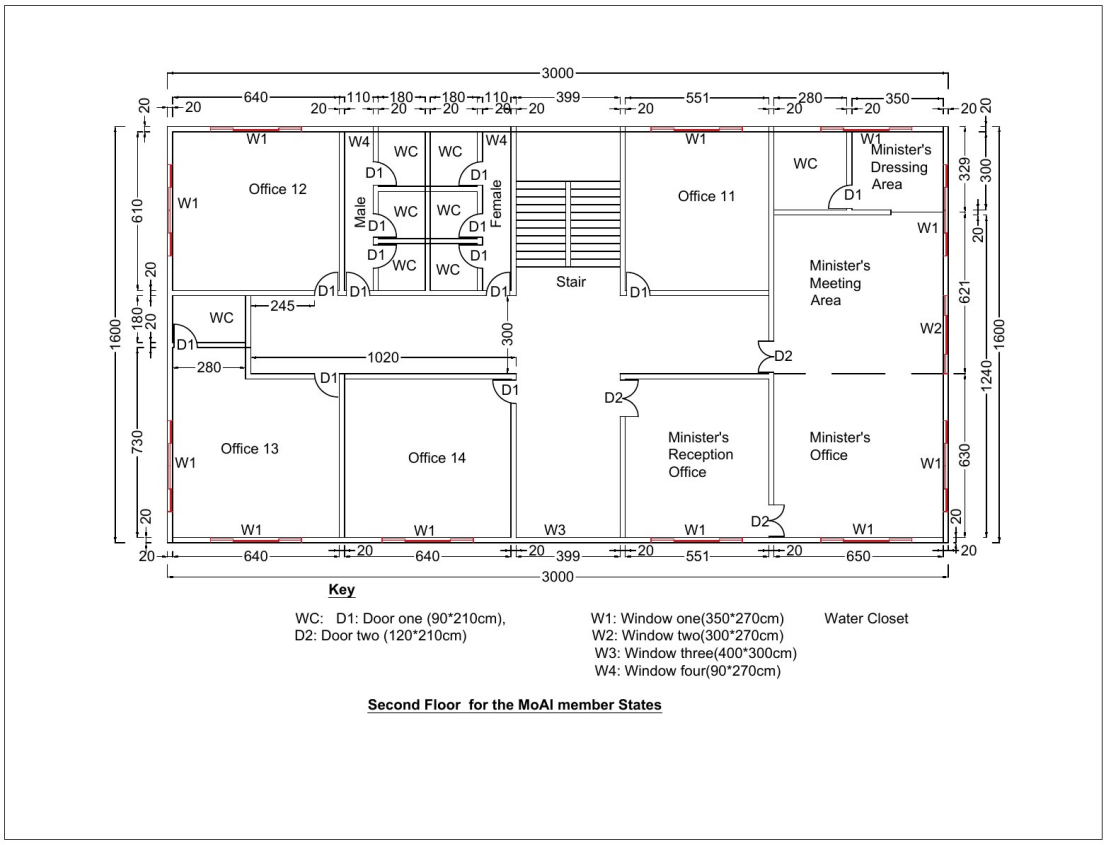
The architectural drawings below show the Ground, First, and Second Floor plans for the proposed Hirshabelle MoAI office building, referenced throughout this ESMP (Sections 1, 2, and 6).



Ground Floor Plan.



First Floor Plan.



Second Floor Plan.

Annex 4: Stakeholder Consultation Notes and Attendance

This Annex records consultation notes and attendance for the two stakeholder engagements held to date. The record below is the attendance register for the High-Level Project Kick-off and Safeguarding Briefing Meeting held on 11 July 2026 at the MoAI Office, Kulmis Village, Jowhar District, facilitated by Mahad Ahmed Hilowle (Section 9.3, Section 9.4). Twelve Hirshabelle MoAI staff attended: 10 male and 2 female.



FSRP
SOMALIA FOOD SYSTEMS RESILIENCE PROJECT

HIRSHABEELE STATE
Ministry of Agriculture and Irrigation
SOMALIA FOOD SYSTEMS RESILIENCE PROGRAM (S-FSRP)
Construction of MoAI Hirshabelle physical government Facilities Jowhar Hirshabelle

ACTIVITY & LOCATION DETAILS

Date of Assessment:	11 july 2026	**Region / District:**	Middle Shabelle/Jowhar
Village	Kulmis Village	**Name of office:**	MoAI office
Facilitator Name:	Mahad Ahmed Hilowle	**Title:**	High Level Project Kick-Off And Safeguarding Briefing Meeting.

PARTICIPANT ATTENDANCE REGISTER

S/N	Participant's Full Name	Sex (M/F)	Age	institution	Phone Number	Signature / Thumbprint
1.	Mohamed Sh. maha	M	50	MOAI	612805484	
2.	mohamed bashir	M	50	MOAI	615504930	
3.	Ibrahman Sh yaalah	M	40	MOAI	617444242	
4.	Geedi Cali Caraf	M	50	MoAI	615574342	
5.	Yusuf Abukar ibrah	M	37	MoAI	615267311	
6.	Cali yusuf ibrahim	M	25	MoAI	618232549	
7.	Daud Said Abdale	M	37	MoAI	611673338	
8.	Qadro Muxumed	F	50	MoAI	616549670	Qadro
9.	Ubak musse Ahmed	F	27	MoAI	615683997	Ubak
10.	yuusuf Ibraahim	M	30	MoAI	615778583	
11.	Saalax Nuur yusuf	M	26	MoAI	613573766	
12.	Mahad Ahmed Hilowle	M	31	MoAI	615710177	

SUMMARY

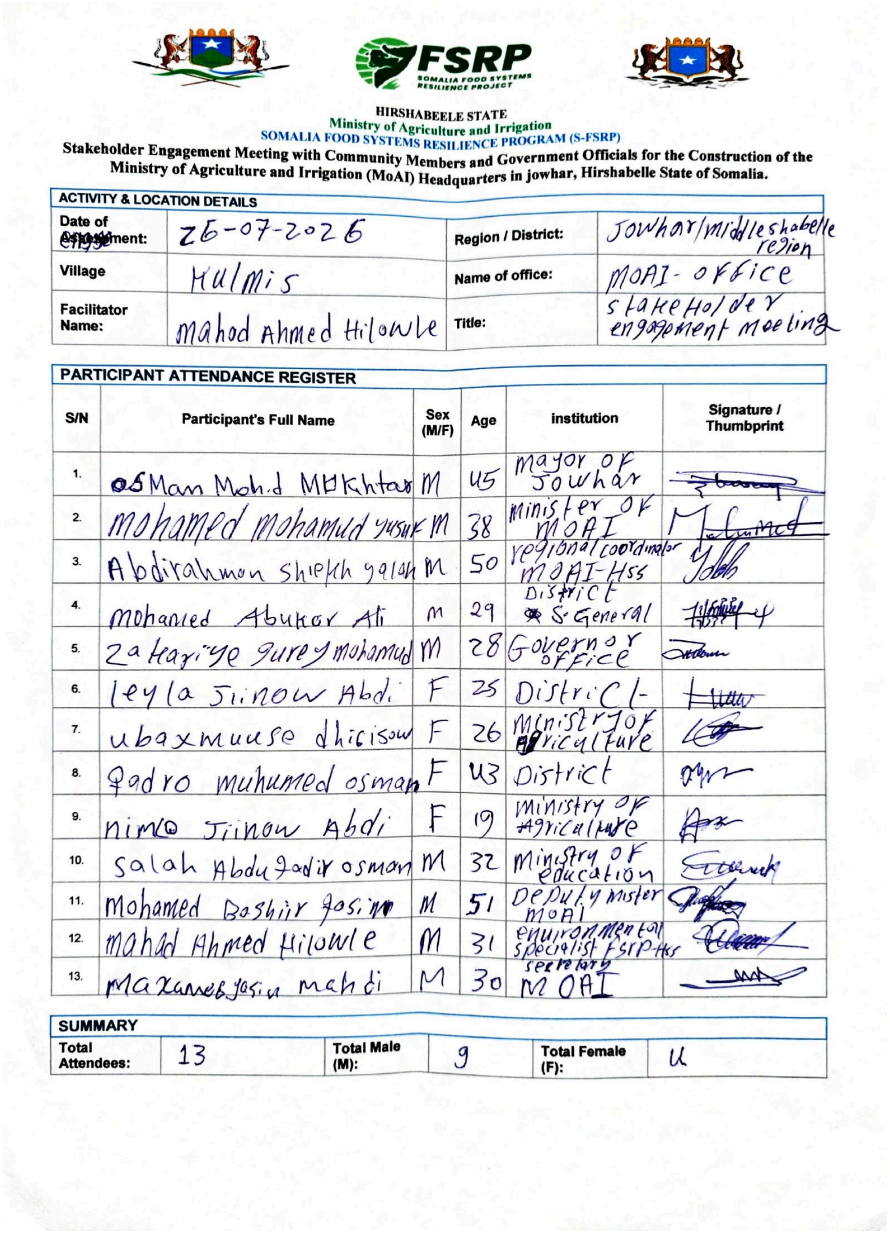
Total Attendees:	12	**Total Male (M):**	10	**Total Female (F):**	2

Stakeholder Engagement Meeting with Community Members and Government Officials, Kulmis Village, Jowhar — 26 July 2026

Following the MoAI-internal engagements recorded above, a broader Stakeholder Engagement Meeting with community members and government officials was convened on 26 July 2026 at Kulmis

Village, Jowhar District, Middle Shabelle Region, extending consultation beyond MoAI staff as anticipated in Section 9.5 and Section 9.6. The meeting was facilitated by Mahad Ahmed Hilowle (Environmental Specialist), Mohamud Abdirahman Osman (Social Specialist), and Laila Mohamed Roble (GBV Specialist), using group discussions and individual interviews with government officials, elders, women, and youth.

Stakeholders welcomed the construction of the new MoAI headquarters and expressed full support for the project. Community members requested that local labor be prioritized for unskilled and semi-skilled jobs, and raised the need for proper waste management, dust suppression, noise control, and protection of nearby vegetation during construction. Participants also requested adequate traffic management, construction safety measures, and site fencing, and encouraged equal employment opportunities for women and youth. Government officials requested regular progress updates and continued engagement, and community members welcomed the establishment of a Grievance Redress Mechanism, requesting that complaint procedures remain simple, accessible, confidential, and responsive. No disagreements were raised during the consultation; all stakeholders supported the proposed project activities. The attendance register is provided below.



HIRSHABEELE STATE
Ministry of Agriculture and Irrigation
SOMALIA FOOD SYSTEMS RESILIENCE PROGRAM (S-FSRP)

Stakeholder Engagement Meeting with Community Members and Government Officials for the Construction of the Ministry of Agriculture and Irrigation (MoAI) Headquarters in jowhar, Hirshabelle State of Somalia.

ACTIVITY & LOCATION DETAILS

Date of Engagement:	26-07-2026	Region / District:	Jowhar/middleshabelle region
Village	Kulmis	Name of office:	MOAI- office
Facilitator Name:	Mahad Ahmed Hilowle	Title:	stakeHolder engagement meeting

PARTICIPANT ATTENDANCE REGISTER

S/N	Participant's Full Name	Sex (M/F)	Age	institution	Signature / Thumbprint
1.	Cismaan Mohid Mukhtar	M	45	mayor of Jowhar	
2.	Mohamed Mohamud yusuf	M	38	minister of MOAI	
3.	Abdirahmon Sheikh yalah	M	50	regional coordinator MOAI-Hss	
4.	Mohamed Abukar Ali	M	29	District S. General	
5.	Zakariye Surey Mohamud	M	28	Governor office	
6.	Leyla Jinow Abdi	F	25	District	
7.	ubaxmuuse dhicisow	F	26	Ministry of Agriculture	
8.	Fadro muhumed osman	F	43	District	
9.	nimco Jinow Abdi	F	19	ministry of Agriculture	
10.	Salah Abdulqadir osman	M	32	Ministry of education	
11.	Mohamed Bashir Jasim	M	51	Deputy minister MOAI	
12.	mahad Ahmed Hilowle	M	31	environmental specialist FSRP-Hss	
13.	Maxamed Jasim mahdi	M	30	secretary MOAI	

SUMMARY

Total Attendees:	13	Total Male (M):	9	Total Female (F):	4

Attendance register, Stakeholder Engagement Meeting with Community Members and Government Officials, Kulmis Village, Jowhar — 26 July 2026.

Annex 5: Photographs

Photographs from the sub-project's stakeholder engagement activities to date are provided below.



Photo 1: High-Level Project Kick-off and Safeguarding Briefing Meeting, MoAI Office, Jowhar — 11 July 2026.



Photo 2: High-Level Project Kick-off and Safeguarding Briefing Meeting, MoAI Office, Jowhar — 11 July 2026 (alternate view).



Photo 3: Site visit to the donated parcel, Kulmis Village, Jowhar — 27 July 2026.

Photographs — Stakeholder Engagement Meeting with Community Members and Government Officials, 26 July 2026



Photo 4: Stakeholder Engagement Meeting with Community Members and Government Officials, Kulmis Village, Jowhar — 26 July 2026.



Photo 5: Stakeholder Engagement Meeting with Community Members and Government Officials, Kulmis Village, Jowhar — 26 July 2026 (alternate view).



Photo 6: Group discussion with community elders, women, and youth representatives, Kulmis Village, Jowhar — 26 July 2026.



Photo 7: Stakeholder consultation session in progress, Kulmis Village, Jowhar — 26 July 2026.



Photo 8: Government officials and community representatives during the consultation, Kulmis Village, Jowhar — 26 July 2026.



Photo 9: Closing discussion of the Stakeholder Engagement Meeting, Kulmis Village, Jowhar — 26 July 2026.