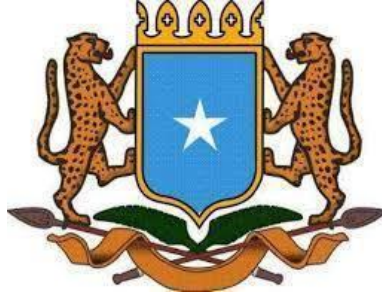


FEDERAL GOVERNMENT OF SOMALIA



Ministry of Finance (MoF)

PROJECT: Somalia Crisis Recovery Project (SCRP)

PROJECT ID- P173315

Environmental and Social Management Plan (ESMP)

**Construction of Sigaalow Maternal & Child Health Facility (MCH)
Beledywne District, Hirshabelle State**

Project Implementation Unit (PIU)

Ministry of Finance

Federal Government of Somalia

10 March 2022

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List of Acronyms and Abbreviations

CERC	Contingency Emergency Response Component
CESMP	Contractor-ESMP
CoC	Code of Conduct
CRW	Crisis Response Window
CRW ERA	Crisis Response Window Early Response Allocation
E&S	Environmental & Social
ESIA	Environmental & Social Impact Assessments
ESF	Environmental and Social Framework
EHSG	Environmental, Health and Safety Guidelines
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FAO	Food and Agricultural Organization
FGS	Federal Government of Somalia
FMS	Federal Member State
GBV	Gender-Based Violence
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanisms
IDP	Internally Displaced Person
IP	Implementing Partner
LMP	Labor Management Procedures
OHS	Occupational Health and Safety Standards
PAPs	Project Affected Populations
PDO	Project Development Objective
PIU	Project Implementation Unit
PSC	Project Steering Committee
POM	Project Operations Manual
PPE	Personal Protective Equipment
PSEA	Prevention of Sexual Exploitation and Abuse
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SCRP	Somalia Crisis Recovery Project
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Security Management Plan
SWALIM	Somalia Water and Land Information Management
SWS	South West State
UN	United Nations
UNDP	United Nations Development Programme
UNICEF	United Nations' Children Fund
UNFPA	United Nations Population Fund
WB	The World Bank
WMP	Waste Management Plan

Executive Summary

The proposed project aims to construct Sigaalow Maternal & Child Health Facility (MCH) in Beledweyne District, Hirshabelle State. In consultation with the local Health Authorities, UNOPS designed a new facility including power, water, sanitation etc. The single storey main building has a floor area of 255m² while the support facilities have a combined area of 98m² therefore a total area of 353m². The geographical coordinates of the MCH are 4°45'18.5"N 45°11'03.1"E.

Beledweyne district is approximately 50km² and is primarily located on the flood plains of the Shebelle River, a perennial river whose origins can be traced further north in the Ethiopian highlands. The type of flooding experienced in the region, where the health facility is located is riverine.

This Environmental and Social Management Plan (ESMP) specifies the means through which the adverse environmental and social risks and impacts of the Project associated with pre-construction, construction and operational activities are either avoided or mitigated. It aims to identify, characterize and manage the potential risks and impacts during the course of the construction of the Sigaalow MCH. The ESMP lists the project-specific risks and impacts and mitigation measures, lays out institutional arrangements of the implementation and monitoring of the risk mitigation measures, and proposes monitoring indicators for measurement and monitoring of E&S performance.

There are significant positive impacts that are expected from the project. The primary beneficiaries are populations in rural areas, including farmers, agro-pastoralists, pastoralists, and rural IDPs (displaced due to various factors and living among host communities in rural areas) that will benefit from the flood-rehabilitation. Reconstructing the MCH will improve health care service delivery for local communities.

The activities associated with the construction of Sigaalow MCH will likely generate adverse site-specific risks and impacts. Most of these are related to typical risks and impacts in civil works. Risks include occupational health and safety of workers, both during the construction and operational phases; community health and safety risks; risks associated with labor rights and management, e.g child labor or forced labor; labor influx and associated risks, such as GBV/SEAH; and others.

This ESMP shows exactly what must be done, by whom, when, and to what standard; and also shows who will monitor its implementation and when, and what the budget implications for both, mitigation measures and monitoring activities are. It further includes the a description of the Project Grievance Redress Mechanisms (GRM), and lists stakeholder consultations that have been conducted in the lead up to the project design.

1. Introduction

1.1 Project Background

The Federal Government of Somalia (FGS) appealed for emergency assistance and investment in longer-term solutions to avert a future crisis in October 2019, with the government-led response directed by a high-level inter-ministerial Flood Response Committee. This was followed by an appeal by the FGS to the World Bank to support a government-led Post Disaster Needs Assessment and Floods Recovery and Resilience Framework for the flood-affected areas in early December 2019, followed by a further request in January 2020 to the World Bank for funding from the International Development Association (IDA) Crisis Response Window (CRW) to support flood recovery and resilience-building.

The Somalia Crisis Response Project (SCRCP) contains the following components:

- 1 **Component 1 Immediate basic services and livelihood support for early recovery** to the flood affected states of Hirshabelle, South West, and Jubaland and locust-affected areas nationally.
- 2 **Component 2: Medium-term flood recovery** to rehabilitate critical public and community infrastructure in line with build-back-better and climate resilient standards.
- 3 **Component 3: Longer-term disaster risk management and preparedness.** This component will strengthen the institutional capacity and preparedness of governmental ministries agencies and departments to respond to flood and drought related emergencies.
- 4 **Component 4: Project Management.** This component will strengthen the institutional capacity Project Implementation Unit (PIU) and State Project Teams for the implementation of the Project.
- 5 **Component 5: Contingency Emergency Response Component.** This Contingency Emergency Response Component (CERC) is included in the Project in accordance with Investment Project Financing (IPF) Policy.
- 6 **Component 6: Anticipatory and Recovery Support for Addressing Food Insecurity.** The proposed scope of this new component supported with subsequent additional financing to address food insecurity has two subcomponents consistent with the original objective of the SCRCP. They are (a) Anticipatory Action and Early Response Support to Food Insecure Communities, and (b) Medium-term Sustainable Recovery and Resilience of Food Insecure Communities.

The proposed sub-project for the construction of Sigaalo MCH will be implemented under component 2 - medium-term flood recovery - which supports the rehabilitation of critical infrastructure in line with build-back smarter standards and community level structural

mitigation efforts for slope protection and environmental rehabilitation. It includes rehabilitation of medical MCHs, which have been affected by floods. For the case of the Sigaalow MCH, a completely new facility has been considered based on the outcome of the feasibility studies of proposed interventions reviewed together with proposed locations available for the purpose.

The health sector needs have been vast and vulnerable to recurrent natural and man-made disasters, including fluctuating levels of conflict, poverty, economic crunch, political uncertainties, drought, floods and epidemics. The burden of diseases (BoD) has been heavily dominated by communicable diseases, reproductive health and undernutrition issues whereas issues related to non-communicable diseases are also on the rise. The re-construction of the MCH shall begin to ease the burden the health sector is already experiencing in the city. There will be improved access to medical health care services by the local community.

The project team has undertaken an E&S screening of the sub-project, as per process described in the SCRP ESMF¹. The screening resulted in placing the sub-project into 'Category C: Moderate Risk', as per the levels defined in the ESMF. It was decided that an ESMP would best guide the risk management for the sub-project.

1.2 Purpose of the ESMP

This ESMP lists the key elements of an Environmental and Social Management Plan (ESMP) capturing the typical Environmental and Social (E&S) risks and impacts and associated mitigation measures that need to be considered at minimum in the context of construction activities of Sigaalow MCH. The purpose of the management plan is to provide a consolidated summary of all the Environmental and Social (E&S)² commitments relevant for the construction commissioning and operational phase of the project, including Occupational Health & Safety (OHS) and waste management. The measures focus on environmental aspects such as air emissions, environmental contamination and social aspects such as communication with local stakeholders and safety of workers and communities. This ESMP lists the project-specific risks and impacts and mitigation measures, lays out the institutional arrangements of the implementation and monitoring of the risk mitigation measures, and proposes monitoring indicators for measurement and monitoring of E&S performance.

The objective of this ESMP is therefore to provide management actions to mitigate negative risks and impacts in consistence with national framework (and/or regional references) and relevant WB's ESSs & WBG General EHSs.

¹ SCRP, Environmental and Social Management Framework, amended August 2021.

² For the sake of simplicity, the acronym E&S is used throughout this document, but this acronym should be interpreted as including environment, social, occupational health and safety, human rights and labour aspects.

2.0 Policy and Legal Framework

2.1 National Regulatory and Policy Framework

Somali policy and legislation with respect to the environment is nascent or outdated. A number of international agreements exist, and although binding on Somalia, there has been little progress in the implementation of those. These international environment agreements include topics such as biodiversity, desertification, endangered species, and ozone layer protection.

In recent years the Federal Republic of Somalia and its Federal Member States (FMS) have effected constitutional changes that define natural resources, common environmental goods and ecosystem services as protectable public assets, and ascertain the right to a clean and healthy environment. However, there are no specific environmental or regulations in place. Protection and use of Somali water resources is the responsibility of the Ministry of Water Resources that has put a policy, act and regulatory framework in place. The Min. for Natural Resources (MNR), shall establish the Regional Watch Councils (REWC). The MNR, in consultation with the Local Government Councils/ District Governor, local CSO/CBOs and the community shall establish the District Environment and Environment Watch Council (DEWC).

As a stop gap measure, in the absence of a national regulatory framework for sustainable environment, Somalia has a **Provisional Constitution** (2012) that contains a number of parameters relevant for various operational activities for the planned sub-project of the SCRIP: Article 12 addresses public assets and natural resources; Art. 11 provides that all citizens have equal rights regardless of sex, and that the State must not discriminate against any person on the basis of gender; Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose; Art 24. Prohibits sexual abuse in the workplace; Article 24.5 stipulated that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place; Article 25 states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.

Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. Furthermore, all people have a duty to safeguard and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment. The FGS and the governments of the FMS affected by environmental damage shall take urgent measures to clean up hazardous waste dumped on the land or in the waters of the FGS; take necessary measures to reverse desertification, deforestation and environmental degradation, and to conserve the environment and prevent activities that damage the natural resources and the environment of the nation, among other measures.

The Labour Code of 1972³ stipulates that all contract of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.

In regards to occupational health and safety standards (OHS), the employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.

The Labour Code further stipulates that workers have the right to submit complaints and the employer must give the complaints due consideration. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.

Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night. The Labor Code further forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade union.

The Labor Code stipulates right to equal pay for the same work as men, paid maternity leave. Women are entitled to 14 weeks of maternity leave at half pay.

The Somali Penal Code of 1962 criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that 'carnal intercourse' and 'acts of lust omitted with violence' are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401.

Somalia National Gender Policy (2016) includes strategies to eradicate harmful traditional practices such as FGM/C and child marriage and to improve services for the management of GBV cases

The National Environmental Policy (2015) promotes the use of appropriate environmental assessment instruments.

³ The Code has recently been revised, but the revisions have not yet been passed and signed into law.

In regards to the institutional capacity for environmental management, a Directorate of Environment is integrated in the Office of the Prime Minister. It is mandated to draft relevant policies and legislation, including establishing of the Environmental Quality Standards, and Sectoral Environmental Assessments, Environmental Impact Assessments (EIA). Laws on environmental governance in Hirshabelle are at infancy stages and environmental impact assessment capacity is nascent. Environmental decision-making arrangements includes the FGS signing international conventions, and parliament approving Environmental Acts and Laws. However, necessary laws have not been formulated yet.

For the project implementation, this project will rely fully on World Bank ESS.

2.2 International Conventions Signed and Ratified by Somalia

The 1992 United Nations Framework Convention on Climate Change (1992). The primary purpose of the Convention is to establish methods to minimize global warming and in particular the emission of greenhouse gases. The Convention was adopted in 1992 and came into force in 1994. Somalia acceded the Convention in 2009. Somalia ratified the Kyoto agreement in 2010 and the Paris agreement in 2016.

United Nations Convention on Biological Diversity (1992). The Convention has three main goals including which are, the conservation of biological diversity (or biodiversity); the sustainable use of its components; and the fair and equitable sharing of benefits arising from genetic resources. Somalia acceded to the Convention in September 2009.

Convention on International Trade Against Endangered Species (CITES): The convention aims to protect endangered plants and animals. Somalia signed the Convention in 1985, and ratified it in 1986. It's current status is that of accession.

Vienna Convention on the Protection of the Ozone Layer: The Vienna Convention was an intergovernmental negotiation for an international agreement to phase out ozone depleting substance in March 1985. It ended in the adoption of the Vienna Convention for the Protection of the Ozone Layer. The Convention encourages intergovernmental cooperation on research, systematic observation of the ozone layer, monitoring of CFC production, and the exchange of information. Somalia ratified the Convention in 2001, and its current status is that of accession.

United Nations Convention to Combat Desertification (2002). The Convention combats desertification in those countries that experience serious droughts and/or desertification. Somalia ratified the Convention in 2002, and its current status is that of accession.

Convention on the Rights of the Child: The Convention on the Rights of the Child from 1989 is the most comprehensive compilation of international legal standards for the protection of the human rights of children. It acknowledges children as individuals with rights and responsibilities according to their age and development, as well as members of a family or community. This

includes non-discrimination, the best interest of the child, the right to life, survival and development and the right to participation. Somalia ratified the Convention in 2015.

Constitution of the International Labor Organization: The constitutional principle is that universal and lasting peace can be established if it is based on social justice. The ILO has generated such hallmarks of industrial society as the eight-hour work day, maternity protection, child labor laws, and a range of other principles. Somalia has been a member of the ILO since 1960.

ILO Convention 182 on Worst Forms of Child Labor. Ratification of this Convention makes a country commit itself to taking immediate action to prohibit and eliminate the worst forms of child labor. Some predefined worst forms of child labor include sale of a child, trafficking of children, forced or compulsory labor, commercial exploitation of children, prostitution or the production of pornography, and work by its nature that is likely to harm the health, safety and morals of children. The Convention was ratified by Somalia in 2014.

UN Convention on the Rights of the Child. The Convention is a Human Rights treaty that sets out the civil, political, economic, social, health and cultural rights of children. It defines a child as any human being under the age of 18 unless the age of majority is attained earlier under national legislation. The Convention was ratified by Somalia in 2015.

Forced Labour Convention (1930/no. 29). The key objective of the Convention is to suppress the use of forced labor in all its forms. It defines forced labor as 'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily'. The Convention has been in force in Somalia since 1960.

Rotterdam Convention: This is a multilateral treaty that came into effectiveness in 2004. The purpose is to promote shared responsibilities in relation to importation of hazardous chemicals. The convention promotes open exchange of information and calls on exporters of hazardous chemicals to use proper labelling, include directions on safe handling, and inform purchasers of any known restrictions or bans. Signatory nations can decide whether to allow or ban the importation of chemicals listed in the treaty, and exporting countries are obliged to make sure that producers within their jurisdiction comply. Some types of asbestos are listed as banned under this treaty but Chrysotile asbestos is not yet banned though there is global discussions to include it on the listed chemicals. Somalia acceded the Convention in 2010.

Convention on the Elimination of All forms of Discrimination against Women (CEDAW 1981): The CEDAW affirms that gender equality is a precursor for development and peace. It establishes legal standards for the attainment of gender equality through the elimination of discrimination against women in all aspects of political, social, economic and cultural life. It highlights the importance of equality and equal opportunity in political and public life as well as education, health and employment. Ratifying Governments are required to set in place measures to enable and expedite gender equality in law and fact as well as confronting the underlying social political inequalities that perpetrate asymmetrical power relations based on gender. Although FGS is yet to ratify CEDAW, although the Cabinet has approved it subject to ratification by parliament.

Protocol to the African Charter on Human and People’s Rights on the Rights of women in Africa (Maputo Protocol). Somalia has signed but not ratified the Protocol

2.3. World Bank Environmental and Social Standards (ESS)

The Environmental and Social Framework (ESF) sets out the World Bank’s commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards. Below is a short summary of the relevant Environmental and Social Standards (ESSs) for this sub-project⁴:

ESS 1: Assessment and Management of Environmental and Social Risks and Impacts. ESS1 sets out the Client’s responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs). This ESS is relevant to this sub-project, and E&S risks and impacts are managed through this ESMP.

ESS 2 – Labor and Working Conditions. ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers. In order to mitigate risks and impacts in relation to labor and working conditions, the SCRP has prepared Labor Management Procedures (LMP), which are annex to the ESMF.⁵ This ESMP lists the relevant procedures.

ESS 3 – Recourse and Efficiency, Pollution Prevention and Management. ESS3 recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution¹ prevention and management throughout the project life cycle consistent with GIIP.

ESS 4 – Community Health and Safety. ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities

⁴ ESS 7-9 do not apply to this project. There are no population groups that are included in the relevant criteria of ESS 7, and there is no cultural heritage findings expected.

⁵ SCRP, Environmental and Social Management Framework, amended August 2021.

that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities. Key risks and impacts of the sub-project in regards to community health and safety relate to GBV/SEA-H, pollution and security. Consistent with this, ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. Risk mitigation measures are listed in this ESMP.

ESS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources.

ESS6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. Biodiversity is defined as the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can therefore often adversely affect the delivery of ecosystem services.

ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. Habitat is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the nonliving environment. All habitats support complexities of living organisms and vary in terms of species diversity, abundance and importance. Where relevant to this sub-project, risk mitigation measures have been listed in this ESMP.

ESS 10 – Stakeholder Engagement and Information Disclosure. This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement has been undertaken for this sub-project, as listed below. In consideration of Covid-19 restrictions, the project has followed World Bank guidelines on community consultation under COVID-19.

2.4 Legal Gap Analysis

The following table presents a gap analysis between WB ESS and applicable local laws and regulations including corrective measures to overcome gaps and responsibilities.

Table 1 Legal Gap Analysis

GAP Analysis World Bank ESS and National Legal Framework			
ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts			
<p>Objectives of ESS 1 are:</p> <p>To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs.</p> <p>To adopt a mitigation hierarchy approach to:</p> <p>(a) Anticipate and avoid risks and impacts;</p> <p>(b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;</p> <p>(c) Once risks and impacts have been minimized or reduced, mitigated; and</p> <p>(d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.</p> <p>To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 12 of the Constitution addresses public assets and natural resources.</p> <p>Article 43 provides guidelines on environmental and social safeguards that can be observed.</p>	<p>Laws have not been developed yet</p> <p>ESIAs not incorporated in federal law yet, and not strong in State-level legislation</p>	<p>An E&S Screening process has been followed for this sub-project in order to assess whether activities require environmental and social assessments</p>

<p>disadvantaged in sharing development benefits and opportunities resulting from the project.</p> <p>To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate.</p> <p>To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.</p>			
ESS 2: Labor and Working Conditions			
<p>The Objectives of ESS 2 are:</p> <p>To promote safety and health at work.</p> <p>To promote the fair treatment, non-discrimination and equal opportunity of project workers.</p> <p>To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.</p> <p>To prevent the use of all forms of forced labor and child labor.</p> <p>To support the principles of freedom of association and collective bargaining of</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose.</p> <p>Article 24.5 stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place</p>	<p>The new labor code, amending the code from 1972, has not been passed yet</p> <p>The implementation of the existing articles in practice may not be very strong</p>	<p>The Project does not allow any forced and child labor. It will hold all contractors liable to the implementation of the LMP</p> <p>The PIU will have overall responsibility to monitor the implementation of the LMP</p> <p>The LMP spells out a workers' grievance redress mechanism; and the GBV</p>

<p>project workers in a manner consistent with national law.</p> <p>To provide project workers with accessible means to raise workplace concerns.</p>	<p>Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labour offences.</p> <p>Every labour law shall comply with gender equality.</p> <p>Dismissal for pregnancy. All women have a special right of protection from discrimination.</p>		<p>Action Plan provides referral pathways for cases of GB</p>
	<p><u>The Labour Code of 1972</u> stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.</p>	n/a	<p>The Project will fully comply with WB ESS 2. This is set out in the LMP (see annex 6)</p>
	<p><u>The Labour Code of 1972.</u> The employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances</p>	n/a	<p>The Project will apply OHS management system that is consistent with the WBG General Environmental Health and Safety Guidelines (EHSGs) on OHC</p>
	<p><u>The Labour Code of 1972.</u> Workers have the right to submit complaints and the employer must give the complaints due consideration.</p>	n/a	<p>This ESMP sets out a workers' grievance redress mechanism</p>
	<p><u>The Labour Code of 1972.</u> Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-</p>	<p>Women are restricted from being employed in night work, and the specific types of work prohibited for women may be prescribed by decree.</p>	<p>The Project will fully comply with the</p>

	discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.	No provisions on the protection of the rights of domestic workers	national law and WB ESS 2. This is set out in the LMP and this ESMP
	<u>The Labour Code of 1972.</u> Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.	n/a	The Project will only allow deployment from the age of 15 (see LMP).However, children under 18 are not to be considered for hazardous work and the work cannot interfere with their education or be harmful for their health.
	<u>The Labour Code of 1972.</u> The Labor Code forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children.	<p>Children are deployed in worst forms of child labor (forced recruitment by army, forced labor in domestic work, agriculture and herding, breaking rocks for gravel, construction work, commercial sexual exploitations)</p> <p>However, Somalia made efforts to construct a rehabilitation center for former child combatants and establish a Human Trafficking and Smuggling Task Force.</p> <p>Children are further deployed in agriculture (farming, herding livestock, fishing); industry (construction, mining and quarrying); services (street work, working as maids in hotels, domestic work, voluntary recruitment of children by army); children also perform dangerous tasks in street work</p>	The Project will only allow deployment – in all project worker categories – from the age of 18 (see LMP). Rigorous monitoring will ensure the application of the LMP.

		<p>Laws do not identify hazardous occupations or activities prohibited for children, and child trafficking for labor and commercial sexual exploitation is not criminally prohibited.</p> <p>Government does not employ labor inspectors and conducts no inspections.</p>	
	<p><u>The Labour Code of 1972.</u> The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade union.</p>	n/a	<p>The project will follow national law and ESS 2.</p>
<p>ESS 3: Resource Efficiency and Pollution Prevention and Management</p>			
<p>The Objectives of ESS 3 are:</p> <p>To promote the sustainable use of resources, including energy, water and raw materials.</p> <p>To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.</p> <p>To avoid or minimize project-related emissions of short and long-lived climate pollutants.</p> <p>To avoid or minimize generation of hazardous and non-hazardous waste.</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia.</u> Somalia passed its Provisional Constitution in 2012. Article 12 of the Constitution addresses public assets and natural resources.</p> <p><u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 25 of the Constitution states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials.</p> <p>Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.</p> <p><u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 45 states that the Government shall give priority to the</p>	<p>Laws in support of the Constitution are still not available. Implementation of the laws and Constitution may be hampered due to the weak justice system</p>	<p>The Project will promote the sustainable use of resources and avoid or minimize adverse impacts on human health according to the Constitution and the WB's ESS3.</p> <p>Detailed measures are laid out in this ESMP</p>

	<p>protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem.</p> <p>All people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment.</p> <p>The FGS and the governments of the FMS affected by environmental damage shall take urgent measures to clean up hazardous waste dumped on the land or in the waters of the FGS; take necessary measures to reverse desertification, deforestation and environmental degradation, and to conserve the environment and prevent activities that damage the natural resources and the environment of the nation, among other measures.</p>		
ESS 4: Community Health and Safety			
<p>The Objectives of ESS 4 are: To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances.</p> <p>To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.</p>	<p><u>The Somali Penal Code of 1962</u>. The Code criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that ‘carnal intercourse’ and ‘acts of lust omitted with violence’ are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401.</p> <p>Art 39(i) makes abuse of power in the commission of a crime an aggravating circumstance and Article 33 provides that when</p>	<p>The Somali Penal Code of 1962 fails to protect survivors and prosecute perpetrators The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and gender based violence</p> <p>Furthermore, in practice however it has been documented that women complaining about a rape may find themselves trapped by the Article 426 prohibition against adultery that makes no exception for the case of rape.</p>	<p>Although the Project aims to improve the lives of previously affected communities, it needs to be ensured that Project activities do not pose any</p>

<p>To have in place effective measures to address emergency events.</p> <p>To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</p> <p>To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams</p>	<p>a superior officer orders the commission of an offence both the perpetrator and his superior will be liable</p>	<p>In practice provisions under Art 39(i) offer little more than theoretical protection</p> <p>Domestic violence: Somalia does not have a law that specifically addresses domestic violence.</p> <p>Abortion for rape survivors: Art. 418-422 Abortion, with or without consent and for honor, including for women who have been raped is prohibited.</p>	<p>unintended negative consequences on communities, for example through increased GBV incidents. This ESMP includes risk mitigation measures to this regard.</p>
	<p>n/a</p>	<p>n/a</p>	<p>Several measures will be undertaken, including contractors will develop road safety management plan and a Health and Safety Plan as part of the CESMP to address the impacts on local communities of moving construction equipment; measures and actions developed to assess and manage specific risks and</p>

			impacts outlined in the ESMPs.
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
<p>The Objectives of ESS 6 are:</p> <p>To protect and conserve biodiversity and habitats.</p> <p>To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity.</p> <p>To promote the sustainable management of living natural resources.</p> <p>To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 25 of the Constitution states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.</p> <p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem.</p> <p>Furthermore, all people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment.</p>	No detailed laws govern biodiversity conservation and sustainable management of living natural resources at this point.	The sub-project does not encroach into any modified, natural, critical habitat and/or protected areas
ESS 10: Stakeholder Engagement and Information Disclosure			
<p>The Objectives of ESS 10 are:</p> <p>To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 32 stipulated that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information</p>	The law on the right of access to information currently only exists as a draft	The sub-project has implement stakeholder consultations and will

<p>with them, in particular project-affected parties.</p> <p>To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.</p> <p>To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.</p> <p>To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.</p> <p>To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.</p>			<p>continue to do so</p> <p>The SCRП GRM is implemented in the sub-project area</p>
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3. Bio-physical and Social Economic Environment

This section describes the overall baseline condition of Somalia, and Beledweyne District in Hirshabelle State in specific, in terms of biophysical environment, as well as the socio-economic background. The target location is the existing Sigaalow MCH in Beledweyne District. The District is the capital of the Hiran Region in Central Somalia. The biophysical environment of the MCH is what is obtained in the district, which is in principle similar to that generally obtained in Somalia, with minor variations.

3.1. Proposed Project Location

The proposed project is located along the northwestern border of Somalia with Ethiopia, in Beledweyne District, Hirshabelle State. The district is approximately 50km² and is primarily located on the flood plains of the Shebelle River, a perennial river whose origins can be traced further north in the Ethiopian highlands. Due to its geographical location, Beledweyne has strategic importance because it is located on the main road that crosses the country and connects Mogadishu to the rest of the central regions of Somalia.

The district consists of four urban villages namely: Bundoweyn, Howlwadag, Haawo Taako and Kooshin. The first two villages are located on the south side of Shabelle River, and the last two are on the north side. Figure 1 below shows the location of Beledweyne District in Hirshabelle State of Somalia.

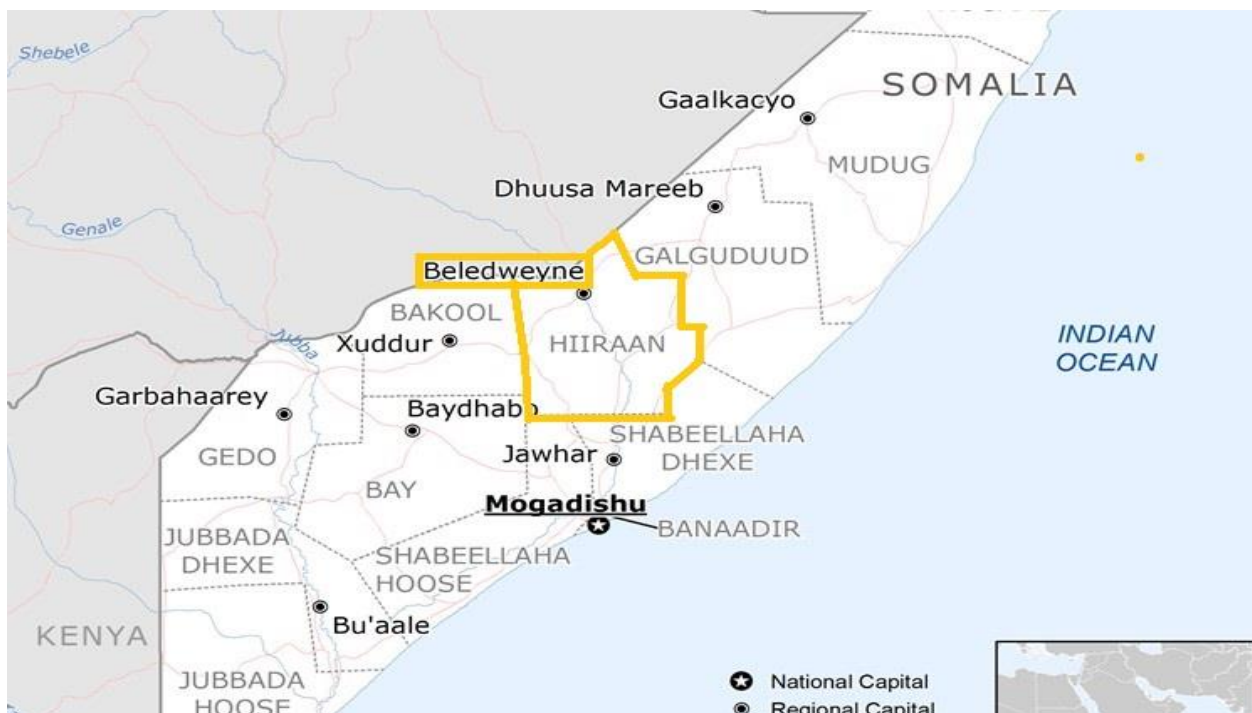


Figure 1 Map showing location of Beledweyne in Somalia in Hiiraan region

The map below shows the locations of the four urban villages in Beledweyne District. The MCH targeted for rehabilitation is located in Beledweyne⁶ (see map below).



Figure 2 Beledweyne Map showing location of Sigaalow MCH

3.2. Physical Environment

Topography: Beledweyne town sits on the floodplains of Shebelle River at an altitude ranging from 180m asl to 200m asl. Sigaalow is at an altitude of 182m asl. The area is generally flat and sits within the riverine area of Shebelle River, as shown in the google map above. Most of the town is on the flood plain and is flat. The soils within the town are generally expansive.

Geology and Soil: Key formations in Somalia include alluvium from the Pleistocene to Holocene period whose general characteristic show Older Pleistocene alluvial sediments and recent alluvium, including sandy clay with lenses of sand and fine gravel to coarse gravels and boulders.

⁶ Beledweyne Urban Profile, UN Habitat 2020

In some parts of the country are fine sands forming dunes and red soils and calcerites. Quaternary unconsolidated sediments are mostly found in the southern coast and the riverine areas of Southern Somalia, which include Beledweyne City.

The Mudug formation, found in the Beledweyne area, comprises of marly and biogenic limestones, calcarenites and sandstones. On the western side of this corridor, the Beledweyne formations consist of gypsum, marls and dolomites. The soils in the area are Fluviol around the riverine area of Beledweyne and then briefly change into Arenosols. The remainder of the city of Beledweyne is made up Gypsisols.

Climate: Somalia is a large, relatively flat country, with an arid or semi-arid climate and prone to severe droughts and floods. Its twelve million or so people mostly support themselves through nomadic pastoralism and agriculture. They are among the poorest in the world, and although no sufficient data is available to allow the country to be ranked relative to others according to the Human Development Index (HDI), it is believed to score very poorly on all HDI indicators.

Hirshabelle State had a poor 2018 Deyr and an abnormally hot 2019 Jilaal season. Additionally, the rains were too late for late planted crops to perform well, and the livestock needed more seasons to recover and breed. On average, the highest temperatures were recorded in March and September of around 35°C, and the lowest temperatures recorded during the months of December and January, of around 22°C, as demonstrated in the graph below. This, however, does not affect the current project conditions, since the HCF is not subject to flooding.

Located at an elevation of 184m above sea level, Beledweyne has a subtropical steppe climate. The district's yearly temperature is 30.41°C and it is 2.5% higher than Somalia's averages. Beledweyne typically receives about 59.0 millimeters (2.32 inches) of precipitation and has 71.36 rainy days (19.55% of the time) annually.

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Nov	Oct	Dec	Year
Record high °C (°F)	37.48 (99.46)	38.49 (101.28)	40.52 (104.94)	39.51 (103.12)	38.49 (101.28)	37.48 (99.46)	36.47 (97.65)	37.48 (99.46)	39.51 (103.12)	38.49 (101.28)	35.45 (95.81)	36.47 (97.65)	40.52 (104.94)
Average high °C (°F)	34.69 (94.44)	36.21 (97.18)	37.26 (99.07)	35.94 (96.69)	34.91 (94.84)	34.18 (93.52)	33.18 (91.72)	33.98 (93.16)	35.56 (96.01)	33.83 (92.89)	33.32 (91.98)	34.14 (93.45)	34.77 (94.59)
Daily mean °C (°F)	29.35 (84.83)	30.36 (86.65)	31.81 (89.26)	31.96 (89.53)	31.31 (88.36)	30.42 (86.76)	29.3 (84.74)	29.72 (85.5)	30.85 (87.53)	30.32 (86.58)	29.75 (85.55)	29.74 (85.53)	30.41 (86.74)
Average low °C (°F)	21.84 (71.31)	21.94 (71.49)	23.83 (74.89)	25.98 (78.76)	25.64 (78.15)	24.18 (75.52)	23.24 (73.83)	23.28 (73.9)	23.71 (74.68)	24.86 (76.75)	24.36 (75.85)	23.31 (73.96)	23.85 (74.93)
Record low °C (°F)	17.22 (63.0)	16.21 (61.18)	17.22 (63.0)	18.23 (64.81)	23.3 (73.94)	22.29 (72.12)	20.26 (68.47)	19.25 (66.65)	20.26 (68.47)	21.27 (70.29)	20.26 (68.47)	18.23 (64.81)	16.21 (61.18)
Average precipitation mm (inches)	0.58 (0.02)	1.36 (0.05)	30.64 (1.21)	162.51 (6.4)	155.25 (6.11)	8.8 (0.35)	4.41 (0.17)	3.77 (0.15)	9.93 (0.39)	176.45 (6.95)	144.48 (5.69)	9.78 (0.39)	59.0 (2.32)
Average precipitation days (≥ 1.0 mm)	0.18	0.27	2.95	13.62	16.21	2.86	1.38	1.01	2.12	18.88	10.49	1.38	5.95
Average relative humidity (%)	46.62	47.07	49.03	54.91	59.45	55.78	54.72	53.65	52.12	60.14	58.94	47.87	53.35
Mean monthly sunshine hours	11.49	11.69	11.64	12.43	12.65	12.63	12.49	12.59	11.89	11.05	11.1	10.56	11.85

Figure 3 Weather by Month in Beledweyne District



Figure 4 Average monthly temperature and precipitation of Beledweyne

Water Resources (Hydrology): Beledweyne’s main river, the Shabelle, generates fertile floodplains, sustains essential agriculture and crop production, and supply Mogadishu with water. Ethiopia, Kenya and Somalia share the Juba–Shabelle river basin, with Somalia being the

lower riparian⁷. Both rivers emerge in the Ethiopian highlands and are Somalia's only perennial rivers.

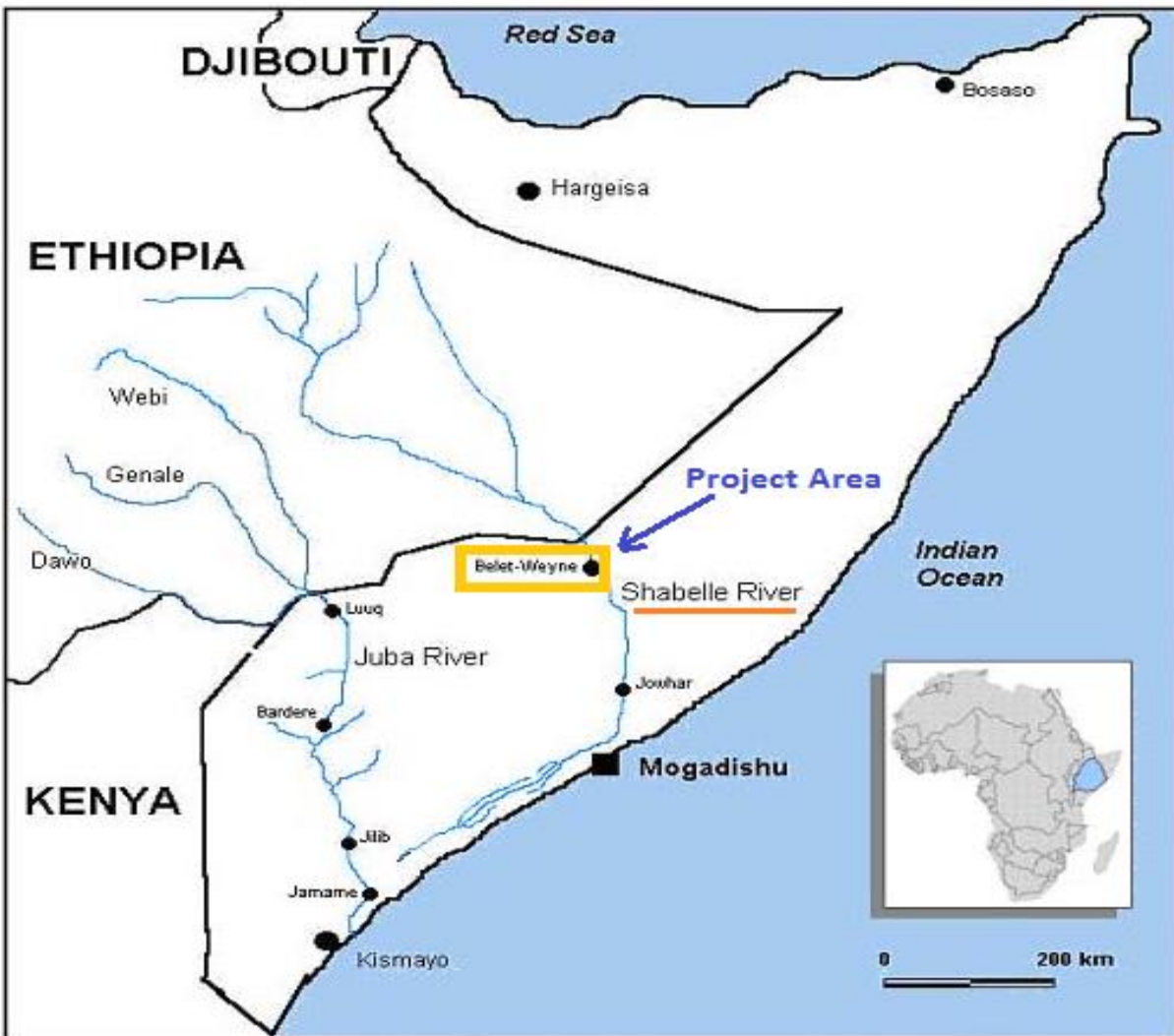


Figure 5 Shabelle River through Beledweyne City

After crossing into Somalia from the Ethiopian highlands, the Shabelle River approaches the coast near Mogadishu. Annual rainfall at the source exceeds 1000 mm. The river does not normally enter the Indian Ocean, but disappears into a depression area, where it is finally lost in the sand in southern Somalia near the town of Jilib (shown on the map above), not far from the Jubba river. Only with exceptionally heavy rains in Ethiopia does the Shabelle River break through to join the Jubba and thus succeed in reaching the ocean.

⁷UN Environment Programme (UNEP), *Africa Water Atlas*, Nairobi, 2010.

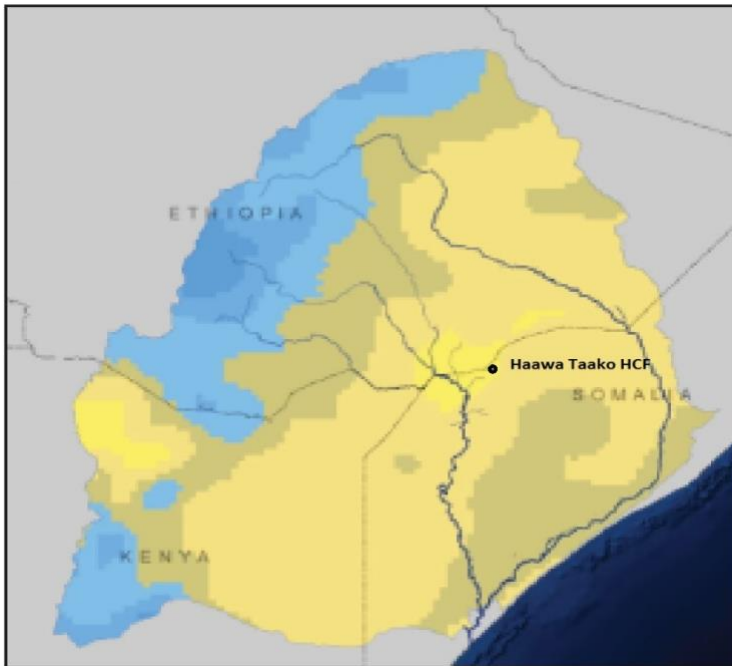


Figure 6 Juba–Shabelle river basin average annual rainfall

Note:

Rainfall levels are graded on a color spectrum with yellow representing areas with low amounts of rainfall and blue representing areas with high amounts of rainfall. The source of Shabelle River has high amounts of rainfall in the Ethiopian region.

Source: United Nations Environment Programme (UNEP), *Africa Water Atlas* (UNEP: Nairobi, 2010).

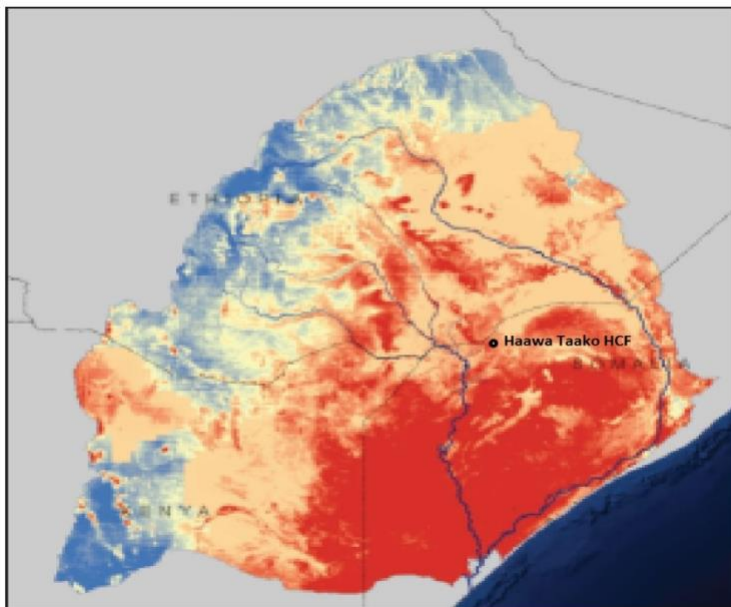


Figure 7 Juba–Shabelle river basin modelled available runoff

Note:

Runoff levels are graded on a color spectrum with red representing areas with low amounts of runoff and blue representing areas with high amounts of runoff. On this map, Shabelle River joins Juba river only when there high amount of rainfall in the highlands of Ethiopia

Source: United Nations Environment Programme (UNEP), *Africa Water Atlas* (UNEP: Nairobi, 2010).

Disaster Vulnerability (Riverine Floods) in Beledweyne City: As indicated in the maps above, over 90% of the runoff is generated by catchments within Ethiopia. As the Shabelle river crosses the international border between Ethiopia and Somalia, the Somali City of Beledweyne in the Hiiraan region is the most important point where the river flow and its water quality could be observed inside Somalia. The river basin has recurrent droughts and devastating floods generated by heavy rains in the Ethiopian highlands, which often cause flooding in Somalia with huge damages.

The urban form of Beledweyne City is defined by the course of the River Shabelle. In the central part of the city, surrounded almost entirely by the meanders of the river, is one of the densest areas characterized by having the main urban services of the city, such as the hospitals, markets and government facilities. Given its geographical location and the challenges of floods in the area, the city experiences riverine floods, which negatively impact on critical infrastructure, such as the HCFs.

Sigaalow is one MCH affected by riverine floods in the area. The facility is in bad shape as a result of the floods, contributing to poor health services in the area. Appropriate interventions must be implemented to improve the health services in the area.

The medium-term flood recovery component of the SCRP supports the rehabilitation of public and community infrastructure, affected in this manner, in line with “build-back-better” standards. The component 2 of the SCRP includes the rehabilitation and restoration of health facilities affected by the riverine floods. Sigaalow MCH has been identified to benefit from this intervention. This particular ESMP focuses on developing remedials against the projected risks and impacts of the rehabilitation works at Sigaalow MCH.

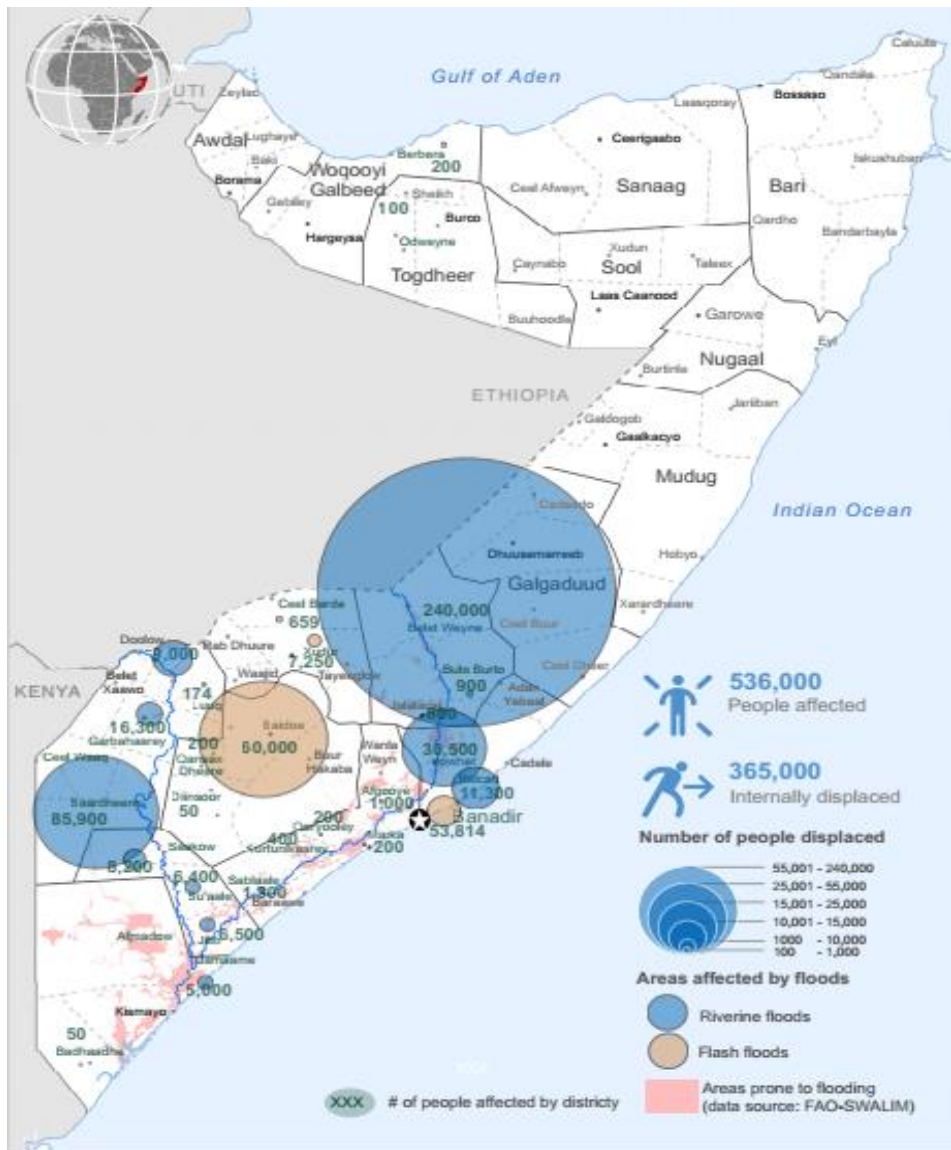


Figure 8 Map of Somalia showing Beledweyne region affected by riverine floods

Source: [Somalia Flood Response Plan, 2020](#)

Fauna and Flora: As in other areas of Somalia, Hirshabelle State vegetation is predominantly deciduous bushland and thicket dominated by species of Acacia and Commiphora. Forest growth is limited due to poor soils and low rainfall.

The fauna is dominated by several livestock species, including the Somali goat, Somali sheep, and dromedary camels. This is due to the largely pastoralist nature of Somali livelihoods. Endemic fauna, such as wild mammals, has largely been diminished through poaching. Giraffes, zebras, and hyenas can still be found. Other endemic mammals include the long naked garanuug (*Litocranius walleri*) and the silver dik-dik (*Madoqua piacentinii*) and the golden mole

(*Calcochloris tytonis*). Reptile species found in Somalia include puff ader snake (*Bitis arietans Somalica*). Bird species include the ostrich and doves.

There are no biodiversity or protected areas in Beledweyne town or in Hirshabelle State.

3.3. Socio-Economic Environment

The strategic position of the city of Beledweyne on the main infrastructure of the country, the Mogadishu-Bossaso corridor, and close to the main agricultural areas of Bay and Lower Shabelle, and to the border with Ethiopia, makes it a central market for livestock and linked products (meat, milk and ghee), and connecting node to the ports of Bossasso and Berbera, both an export route port for agricultural products (cereals and legumes) and imported foods that make up a substantial part of the population diet: rice, sugar and vegetable oil, along with other non-food essentials, from soap to clothing.

The territory is also vastly diverse, hosting three of the four broad categories of rural livelihood (Pastoralism, Agropastoralism and Riverine Agriculture) and four of the 18 rural livelihood zones identified in Somalia⁸

Hawd Pastoral
Southern Inland Pastoral
Southern Agropastoral
Juba Shabelle Pump Irrigation

Beledweyne City is representative of the dramatic changes in the lifestyle of Somalis which are also impacting the way they work, live, and settle. For example, pastoralists households whose herds declined due to repeated droughts and other problems turn to agro-pastoralist. On the other side, there is a growing tendency for wealthier pastoralists to settle into fixed houses, where they may own one or several berkads and possibly a tea-shop or small goods store, and from where they send out their animals with family members or herders contracted from less wealthy households, since livestock are still their main wealth. Most of these new and old settlement fall into the “rural” group, without consideration their different patterns or the notable differences in terms of densities, functions and morphology. Far from being an exhaustive sample the Somali territory, the district of Beledweyne offers a glance at the complexity and at the rich variety of human settlements present in the country⁹.

⁸ FSNAU, Somalia Livelihood Profile, 2016

⁹ Settlement Pattern in Somalia; A Case Study on Beledweyne District

Administration and Governance: Hirshabelle State is the youngest state in Somalia. The Beledweyne District Administration is led by a mayor, who was appointed by the Hirshabelle State. She is the first female mayor in Somalia. Beledweyne also has a district council. According to the Fragility Index Maturity Model (FIMM) respondents, the council is representative of local sub-clans. District authorities at times struggle to maintain security and law and order in the town¹⁰. Local revenue is generated through taxes and registration fees for businesses and NGOs. A Council of Elders exists in Jowhar (the state capital) and is relatively influential, particularly on matters concerning clan conflicts and resource disputes. The council reportedly works with the local government to help with local stability and peace processes. The full council consists of 40 members from a wide range of sub-clans¹¹. These local institutions may be able to provide support in potential conflicts or land and resettlement issues.

In the Middle Ages, Beledweyne was part of the influential Ajuran Sultanate, that covered much of southern Somalia and eastern Ethiopia extending from Mareeg in the north to Qelafo in the west and Kismayo in the south. The town later came under the administration of the Hawadle Sultanate in the late 17th century after the collapse of the powerful Ajuran Empire. At the turn of the 20th century, Beledweyne was incorporated into the Italian protectorate. After the independence of Somalia in 1960, the city was made the center of the official Beledweyne District. In 2006 the Islamic Courts Union (ICU) assumed control of Beledweyne and other parts of southern Somalia, but the Transitional Federal Government (TFG) supported by troops from Ethiopia and the African Union re-established its authority in the month of December of the year. In 2009, the Islamist al-Shabab militia took the town and imposed new rules. The town was recovered from Al Shabaab by the Somali National Army (SNA) with the help of the African Union Mission in Somalia (AMISOM) in 2012. In 2016, Beledweyne became part of the Hirshabelle State of Somalia.

Social Services: Beledweyne Town hosts 23 formal schools, 15 of which offer both primary and secondary education levels, while the rest is for primary education only. The largest of these include Horseed, Abdisomane, Mujamac and Al-Aqsa. Fees for primary school start at \$10, with secondary costing approximately \$15. Schools often are understaffed, with teachers working for prolonged periods without regular pay. In addition, there are 7 universities offering higher education to the community, namely Beledweyne, Central, Green Hope, Hiran, Jobkey, Plasma and Somavilla Universities. These universities offer different programs, such as business administration, IT, public administration, medicine and agriculture. They charge on average \$ 35 per semester.

¹⁰ Fragility Index Maturity Model (FIMM), Round 3 - March 2019

¹¹ DTTO

BECO and Haji provide electricity. Internet services can be accessed 75% of the time. Public areas are well lit at night. Mobile phone coverage is provided by Tecno, Itel, Global, Hormuud and Somtel.

There are many religious buildings, such as mosques and Koranic school centres, but there is no official data regarding the exact number. The district has one main football stadium that is located in Haawo Taako village. It is called Laqanyo Stadium and was built in 2015. There are also markets and police stations placed in strategic locations.

The civil war destroyed the infrastructure of the state, including health services. Rebuilding of the health sector is challenged by a shortage of professional staff, financial resources, and effective governance. Moreover, an overall privatization of the service sector, decentralization and deregulation following the war have greatly changed healthcare provision.

The health care system in Somalia therefore remains weak, poorly resourced and inequitably distributed. Health expenditure remains very low and there is a critical shortage of health workers. As a result, around 3.2 million women and men in Somalia are in need of emergency health services. An estimated 1.1 million displaced people live in substandard conditions. There is a high risk of measles outbreaks due to crowded settlements and a high risk of acute watery diarrhoea (AWD)/cholera outbreaks due to limited access to basic sanitation and hygiene services¹². Flood disasters experienced in Somalia worsens the situation.

Somali's Beledweyne General Hospital provides most of the medical cover for the district, but it lacks sufficient medical equipment and supplies. The hospital is supplemented by clinics run by NGOs. Private clinics are available to those who can afford them, with fees starting at \$50 for consultations. All four subdivisions of Beledweyne District have at least one medical HCF and they are supported by NGOs¹³.

¹² World Health Organisation Humanitarian Response Plan in 2015

¹³ Beledweyne Action Plan, 2019

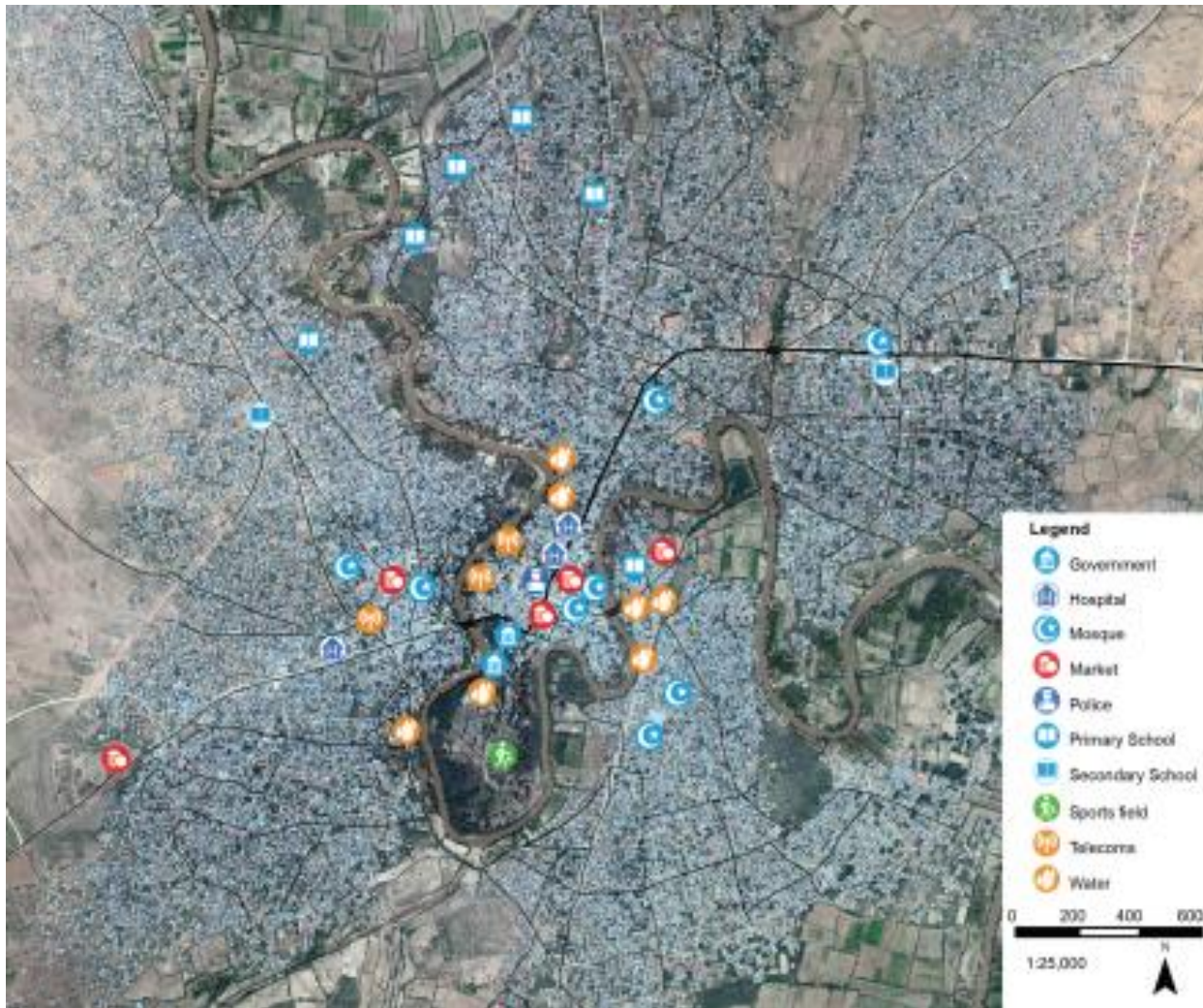


Figure Google map of Beledweyne showing health facilities

Over the years, the floods in the city have affected a number of infrastructures, including the MCHs. In this respect, the medium-term flood recovery component, under the SCRPs supports the rehabilitation of public and community infrastructure in line with “build-back-better” standards. The component is to rehabilitate water and sanitation systems, broken or non-functioning pre-existing flood control systems (e.g., embankments, drainage, irrigation canals and restoration of river channels through dredging), health facilities, bridges, and small feeder roads. It also supports local mitigation efforts for risk reduction, such as slope protection and environmental rehabilitation.

Sigaalow MCH is one of the MCH in the area that has been selected for reconstruction. It is currently operational and in a temporary building subject to flooding. The current status of the facility is as shown in the picture below.



Figure 9 Sigalow MCH

The MCH with a reported average number of up to 80 out-patients per day provides the following services;

- Outpatient services for under 5 years of age
- Outpatient services for over 5 years of age
- Ante-natal and postnatal consultation
- Normal delivery services
- Nutrition OTP (Outreach Therapeutic Feeding Program)
- Vaccination services under the Expanded Programme for Immunization (EPI)

At present, in regards to waste water, the facility makes use of pit latrines with mostly pour flush and a cesspit. There are two pit latrines at the site, serving staff and patients. In view of solid waste, there waste is separated into medical and non-medical waste, and then incinerated on site. The ash is then collected and disposed of at a designated site outside Beledwyene Town.

The rehabilitation of the existing infrastructure for Sigaalow MCH has been assessed as not feasible. It was therefore proposed to construct a completely new facility in the same location, with enough capacity to adequately cater for all the above services. This means the existing structures will need to be demolished to pave way for new health care infrastructure.

There is no requirement for a borrow site for the construction of the HCF. Sufficient local materials for construction are available: cement, timber boards, CGI sheets, paint, hoop irons, binding wires, timber frames and others.

A community hall that has been requested by the client has also been designed in the site plan, but its construction will be subject to budget availability. The existing GBV centre will be retained though not currently operational.

Population Profile: According to the population census conducted by Somali authorities, with support from UNFPA in 2014, it was estimated that the Hiraan Region had a population of 502,685 persons. From these estimates, close to 50% of the population are nomads.

Table 2 Population profile of Hiraan State

Region	Urban	Rural	Nomads	IDPs	Total
Hiraan	81,379	135,537	252,609	51,160	520,685

Source: UNFPA 2014

For what pertains the rural population, it is distributed as the following:

- Southern Agro-Pastoral 96,590
- Riverine Pump Irrigation 18,973
- Hawd Pastoral 36,393
- Southern Inland Pastoral 18,973

More recent projections, relative to 2018, talked about a population 306,594, with an urban population of 111,634 and a non-urban population of 194,960.

According to the PESS, the district in 2014 had 235,214 inhabitants, roughly 2% of the Somali population, with 72.7% in rural and 13.3% in urban areas, as shown in the table below.

Table 3 Population of Beledweyne

Region	Urban	Rural	IDPs	Total
Beledweyne City	31,410	170,930	32,410	235,214

The major clans in the district are mostly Hawiye, including Hawadle, Galjecel, Jejele and Makane. Somali constitutes the main language, some people speak Arabic. None of the groups qualify to be counted under ESS 7 'Indigenous People / Sub-Saharan African underserved Traditional Local Communities'. All groups speak Somali as indigenous language, and other than distinctions based on kinship (in the case of Beledweyne sub clans of the Hawiye clan), there are no groups that separate themselves on the basis of socio-cultural identities or features.

The city of Beledweyne enjoys a privileged location that makes it an important commercial hub for livestock and agricultural production. However, the rapid growth of the city, the big influx of IDPs and the high risk of flooding make urban planning more necessary than ever. Although there may not be urban planning laws in place, it is possible to move towards sustainable development with good coordination among the actors active in the district, and following some basic town planning principles. If no particular urban planning effort is undertaken, current unsustainable development trends can be expected to continue and urban problems, especially those related to the management of the Shabelle River, will rapidly intensify.

The city has also grown due to large IDP influx. The west side of the city hosts a large IDP settlement, called 'ex Airport' and some smaller IDP sites in Howldlag village. IDPs constitute the key vulnerable groups in the city. Further vulnerable groups include women and girls as well as elderly people.

Beledweyne is located at a major trade gateway, connecting the north and the south of the country. It is also key for the country's agricultural and livestock production. It serves the markets in the region, including international exports through Berbera and Bossaso seaports. Small scale farmers cultivate maize, soybeans, groundnuts, sesame and sunflower. Large scale farmers grow vegetables and fruits, including mango, watermelon, papayas and more. Livestock markets in town bring together livestock traders from the whole region.¹⁴

¹⁴ AMISOM, Belet Weyne, Sector IV Profile, accessed at: <https://amisom-au.org/wp-content/uploads/2013/11/Sector-IV-Belet-Weyne.pdf>

4. Project Description

4.1 Proposed Intervention - New MCH

Sigaalow MCH has been identified as one of the health facilities to be demolished and reconstructed to improve health care service delivery in the local community, following the destruction of the same through flood drainage. In consultation with the local Health Authorities, UNOPS designed a new facility including power, water, sanitation etc. The single storey main building has a floor area of 255m² while the support facilities have a combined area of 98m² therefore a total area of 353m².

The existing healthcare facility will be sectioned off from the new construction area and remain open for the duration of the construction period. After completion and migration to the new facility, the existing facility will then be demolished to allow for the parking area to be done.

Below is the proposed design of the designed building developed according to the UNOPS design planning manual.

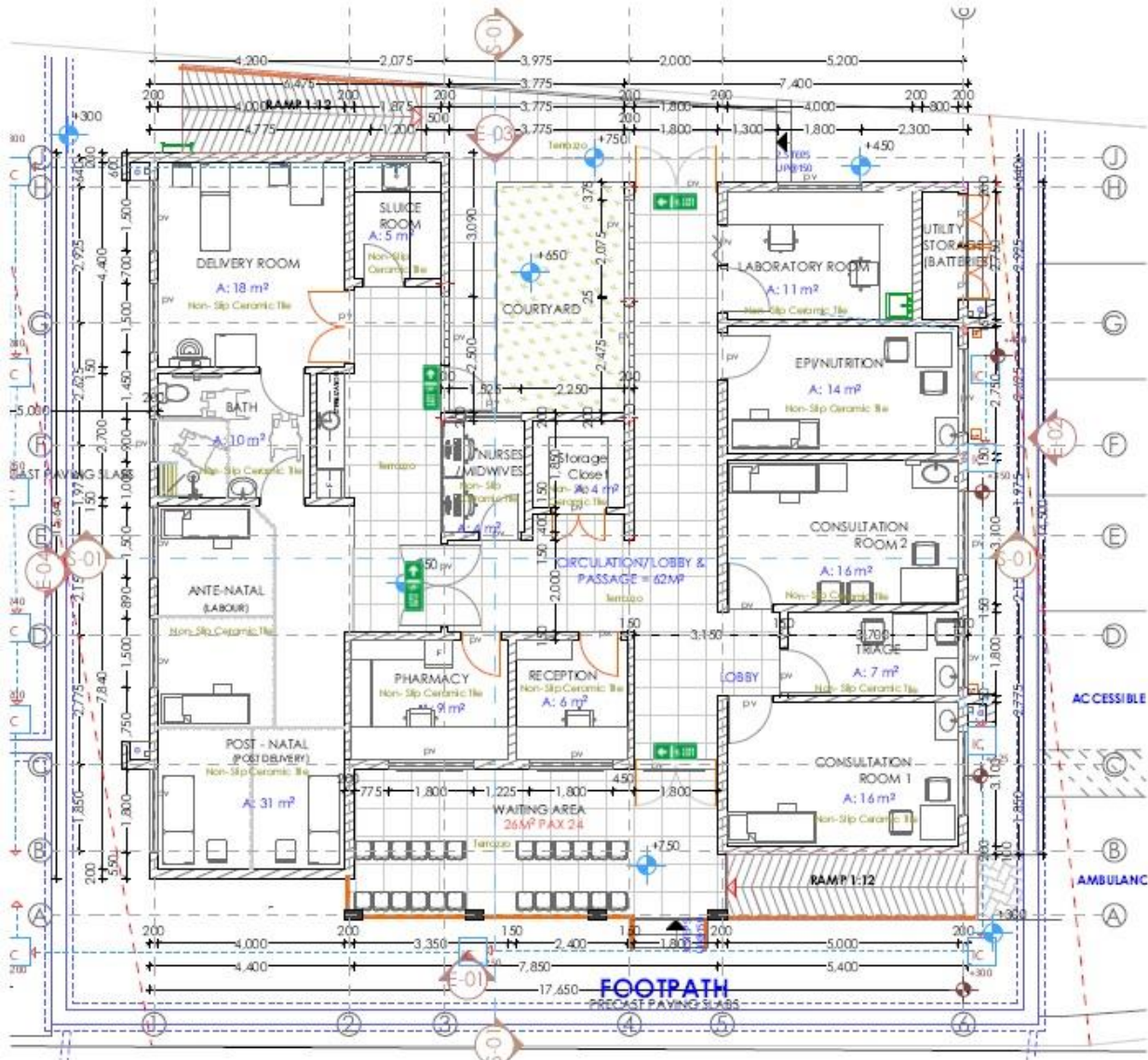


Figure Proposed design for the new facility at Sigalaw

Separate from the main building will be an ablation block covering a floor area of 98m². The ablation block has been designed to incorporate a laundry facility, a cleaner's room, staff changing rooms (male & female) & public washrooms (male & female).

Other amenities and services included in the new MCH design are the following;

- water storage capacity of 24,000 litres,
- solar panels for sustainable electricity supply.
- Solar water heating for sustainable practices
- Future flood prevention: Raising of floor level of the main building by 750mm from current ground level to prevent damage in the event of a flood. The entire site has been raised by 300mm to allow for a graded sloped area within the site for natural flow to

stormwater drains, which have been adequately designed for within the site and along the main road to the site. Surface water for hard standings will be discharged on site and to road drainage as appropriate. The site will be graded and sloped toward the access road to aid in storm water drainage. Ground covers, shrubs and trees will be planted where necessary to improve the micro –climate.

- Determination of waste management:
 - construction waste. BoQ preliminaries allow for demolition and disposal of any construction waste according to local authority guidelines. The specification document also outlines the handling of construction waste both on site and in transit for disposal.
 - operational waste.
 - Waste water: The proposed waste water disposal will be to a septic tank and proposed soakpit. Septic tank sludge will be disposed of as per Beledweyne town authority approval and guidelines.
 - Solid waste: As is current practice, the existing incinerator for this MCH will continue to be used to dispose (through incineration) solid medical and non-medical waste with the ash collected and disposed of at a designated site outside Beledweyne Town. A placenta pit has been provided in the design to cater for the medical waste disposal of the placenta in a culturally acceptable way.
 - Safe solar battery replacement: The Electrical Specification provides for provision of O&M manuals and training on this. A dirty utility room will be provided.

Below is the site plan showing the site layout and location of the various buildings on site.

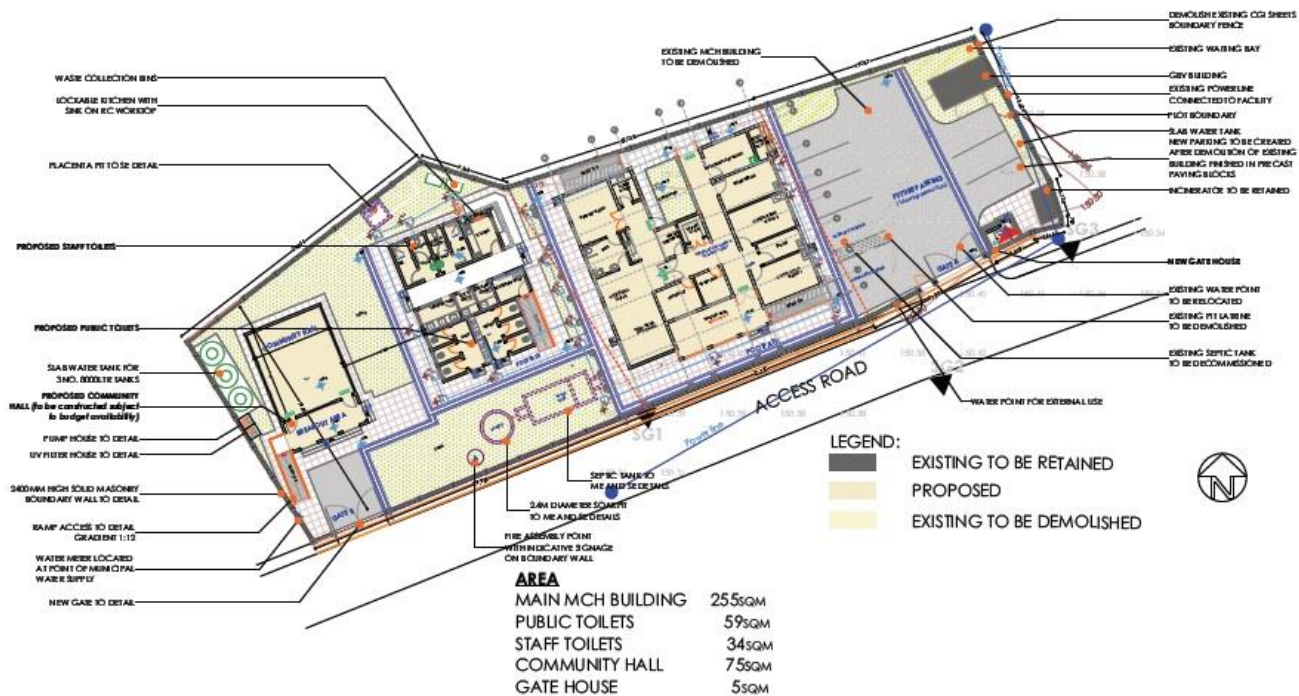


Figure Proposed site plan for the new facility at Sigaalow

4.2. Project Activities

Design Phase: The design phase included the following activities:

- Surveying
- Geotechnical Investigations
- Design of a layout plan
- Design of the MCH and other support facilities
- Design of drainage around the site for future flood prevention
- Design and specification for waste management arrangements (construction waste and operational phase waste)

Construction Phase: The construction phase will mainly include the following activities:

- Installation of site hoarding to secure the construction site
- Planning of project traffic – including traffic safety measures
- Where feasible, preserve some trees at the construction site
- Construction of foundation activities.
- Actual construction of the MCH
- Construction of a septic tank and a soak away sewer management
- Installation of above ground water storage tank of capacity 24 ,000 litres and 6,000 litres overhead distribution water tanks.
- Installation of solar panels facilitate various operations and activities at the MCH
- Installation of a solar water heating system

- Installation of the fire detection and fire fighting equipment.
- Demolition of existing structure and clearing: demolish existing main building and waiting shed comprising of corrugated iron sheet wall & roof, RC handstand floor slab/partitions with and including excavations of any existing foundation works and walling, and any other works thereof below the ground floor slab. Prepare the surfaces to receive the new parking area
- Set aside and store carefully removed sheet on site as shall be directed by the Client; remove all other debris from site & dispose as cart away.

There is no requirement for a borrow site for the construction of the MCH . Sufficient local materials for construction are available: cement, timber boards, CGI sheets, paint, hoop irons, binding wires, timber frames and others.

Access to the site is via a dirt road. Access to town by road allows for materials, which are not locally available to be brought in from nearby locations.

Operation Phase: The operational phase activities will include:

- Establishment of Standard Operating Procedures for the hospital, including emergency response procedures.
- Occupational Health and Safety for workers
- Training of the health worker in the management of generated clinical waste
- Operation of the MCH in full compliance with the Medical Waste Management Plan
- Maintenance of the solar panels to ensure they are safe from vandalism.

5. Environmental and Social Risks and Impacts

This section lists the anticipated positive and adverse risks and impacts associated with the construction of the Sigalaw MCH.

Negative Risks and Impacts: The activities associated with the construction of the MCH will likely generate adverse site-specific risks and impacts, such as:

Demolition and Construction Phase

- Management and disposal of material generated from construction activities during the construction phase,
- Management of rubble (solid waste) from the existing facility,
- Use of existing borrow pits which may further deteriorate the surrounding environment.
- Increased level of dust, noise and vibration from moving of construction vehicles and machinery,
- Increased level of air pollution through operation of heavy equipment and vehicles for construction,
- Generation of construction waste,
- Sourcing of materials, an activity which may degrade the surrounding environment,
- Security for project operations including the protection of project workers and beneficiaries,
- Labor influx and associated risks such as GBV/SEAH,
- Risks associated with labor rights and management, e.g., child labor or forced labor,
- Occupational health and safety of workers both during the construction and operational phases,
- Challenges in access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring,
- Disruption in healthcare services for the current and potential patients.
- Traffic risks during construction,
- Limitations in effective community engagements and participation,
- Security for project operations including the protection of project-affected persons,
- Community health and safety risk: traffic safety, water and sanitation safety, life and fire safety, protection from COVID-19.

Operation Phase

- Waste management, including hazardous waste and sanitation services (septic tank pumping),
- Medical wastes, wastewater and air emissions leading to contamination of the environment and the workers
- Increased air emissions from the incinerator,
- soil and water contamination,

- pollution associated with improper disposal of malfunctioned or end of life solar panels,
- Risk of infection among health professionals
- Risk of infection to the handlers
- Physical hazards (for example, handling of sharps);
- Electrical and explosive hazards;
- Fire;
- Ergonomic hazard;
- Radioactive hazard
- Poor sanitation conditions at the HCF leading to discomfort and poor aesthetic values
- Carriage of healthcare waste through public streets can be a risk in case of an accident or more spill of health care waste

More generally, the near complete lack of environmental legislation in Somalia, and the lack of capacity of the Government to monitor and implement environmental risk mitigation and protection pose significant risks.

No land and resettlement impacts are anticipated because the proposed site is on public land, and has been designated for a MCH. Community consultations have further shown that there are also no encroachments on the same piece of land. Furthermore, the project will engage local personnel for brick work and other labor requirements. These local persons will be coming from within the local community and therefore there will be no need for workers campsite. The engineers and supervisors will be renting a house within or from another town nearby and will have to drive to site for supervision works. There will be a site office within the designated project area but there will not be any need for workers camp.

6. Risks/Impacts and Mitigation Measures

The table below lays out the specific adverse risks and impacts anticipated for the project, lays out the respective mitigation measures required to reduce or eliminate the projected project impacts. This matrix forms the core of the ESMP, since it shows exactly what must be done and by whom.

The table also discusses the management of generated medical waste during the operation of the MCH. This table therefore presents parameters which relate to the management of medical waste during the operation of the Sigaalow MCH. It is expected that once construction of the Sigaalow MCH has been concluded and the MCH is commissioned, there will be generation of medical/clinical waste on a daily basis, and will require implementation of best mitigation measures.

Table 4 Environmental & Social Management Plan: Re-construction of Haawa Taako HCF

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts						
ESS 1	Preparation Phase					
	Access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring will be a challenge, as Project location is in a remote underserved areas with basic physical and community infrastructure devastated by drought and floods.	<ul style="list-style-type: none"> Implement SEP and create awareness of GRM 	SPT / PIU	Included in PIU staff costs Travel costs: 2,000	Records of engagement for awareness raising on GRM Stakeholder engagement records	at the beginning of activity and throughout implementation
	Construction Phase					
	Implementation of the respective mitigation measures against the negative impacts identified in this ESMP	<ul style="list-style-type: none"> Provide H&S Training to the construction workforce (including sub-contractors, temporary workers and drivers) Raise awareness to the workforce regarding the implementation of the ESMP tailored to the project scope, through toolbox talks and other platforms 	Contractor	1,000 USD for logistics	H&S Training session Record of awareness raising session	At the beginning of construction activity
ESS 2: Labour and Working Conditions						
ESS 2	Construction Phase					
	Risk of Insecurity of all project workers	<ul style="list-style-type: none"> IPIU to prepare District Security Risk Assessment 	PIU / Contractor	Costs for security risk implementation	District Security Risk Assessment	Prior to commence

	<ul style="list-style-type: none"> PIU to prepare local Security Management plan (SMP) Contractor to prepare local Activity Security Plan Implementation of SMP and local Activity Security Plan 			<p>Local Security Management Plan</p> <p>Local Activity Security Plan</p> <p>Mitigation measures of local Activity Plan implemented</p>	ment of activity
Risk of labor and working conditions of all the workers don't comply with WB and Somali legislation – including OHS risks.	<ul style="list-style-type: none"> Implement and monitor the LMP Listing of all staff and titles, new hires and departure Site visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector or auditor name 	Contractor	Incl in contractor staff costs	<p>Register provided</p> <p>Log book showing site visited and actions taken</p>	monthly
Risk of labor influx leads to increase of GBV cases	<ul style="list-style-type: none"> All workers to sign CoCs. Dedicated reporting channel for victims through Project GRM 	Contractor	Incl in contractor staff costs	Signed COCs	At start of project
Risk of discrimination against women in employment	<ul style="list-style-type: none"> Contractor to develop recruitment and retention policies that enable fair working conditions and women's safe and equitable participation. 	Contractor	Incl in staff costs	<p>Recruitment and retention policies</p> <p>Signed COCs</p>	At start of project

		<ul style="list-style-type: none"> All workers to sign CoCs. 				
	Risk of delayed payment or underpayment of workers, leading to complaints and conflict	<ul style="list-style-type: none"> Ensure provision of timely payment Ensure provision of workers' GRM 	Contractor	Incl in contractor staff costs	Records indicating that payments made on time Existence of Workers' GRM	Monthly
	Risks of child and forced labor resulting in employing of underage children and human trafficking	<ul style="list-style-type: none"> Set-up of a workers' GRM to ensure their voices / complaints are heard Contractor to maintain staff records, ID copies, and perform spot checks against child and forced labor. 	Contractor	Incl in contractor staff costs	Existence of Workers' GRM List of names of workers and their gender and age made available for review	At start of the project
	Risk of spreading COVID 19 at work place	<ul style="list-style-type: none"> Contractor to ensure workers have access to face masks and sanitizers. Regular sensitization on COVID 19 to ensure workers observe the social distancing especially when in the community and public places 	Contractor	Incl in contractor staff costs	Face masks and sanitizer available Sensitization session	Prior to activity commencement and throughout activity
	Risk of workers being unaware of the dangers at the site (quarries, construction site etc...) leading to injury	<ul style="list-style-type: none"> Regular review and provision of PPE to the project sites Workers' GRM in place Regular fire drills 	Contractor		Evidence of regular reviews conducted Workers' GRM in place	Monthly

				Evidence of fire drill conducted	
Operation Phase					
Risk of medical wastes, wastewater and air emissions leading to contamination of the environment and the workers	<p>Medical Waste</p> <ul style="list-style-type: none"> Ensure waste is segregated at point of generation to the extent possible for easy handling Ensure the segregated waste is appropriately packaged in colored containers using standard clinical waste color codes for respective waste type, and stored for final disposal consistent with the WHO standards <p>Air emissions</p> <ul style="list-style-type: none"> Rigorously segregate waste so that no PVC (IVs, etc.) waste is incinerated and instead directed to the appropriate waste bag for appropriate disposal 	Ministry of Health (MoH)	Incl. budget of MoH	<p>Labelled secure bags for generated medical waste</p> <p>Wastewater and air emissions analytical results availed for review and within statutory limits</p>	Quarterly
<p>Risks of physical hazards (for example, handling of sharps);</p> <p>Electrical and explosive hazards;</p> <p>Fire;</p>	<ul style="list-style-type: none"> Ensure a local risk assessment (identification of risks at work) is conducted for each process step, that is, from sample collection to disease 	MoH	Incl. budget of MoH	Local risks assessment conducted every year and specific hazards identified for	Monthly

	<p>Chemical use;</p> <p>Ergonomic hazard;</p> <p>Radioactive hazard</p>	<p>isolation to identify specific hazards and for each identified risk, appropriate risk control measures must be defined.</p> <ul style="list-style-type: none"> • Provide safety training in the management of hazards identified other than those related to sample handling • Provide review of Infectious Preventive Control training for the health care facility staff, including Health Care Workers charged with the responsibility to handle and dispose of the medical waste • Ensure conducting regular fire drills 			<p>each and way forward</p> <p>Regular safety training provided</p> <p>Review of training provided</p> <p>Fire drills conducted every 6 months</p>	
	<p>Risk of infection among health professionals</p>	<ul style="list-style-type: none"> • Ensure appropriate training on Infectious Prevention and Control for healthcare workers and other staff. • WHO prescribed protocols for personal protection of healthcare professionals is to be enforced at all times • Ensure training in Health care waste management systems, which enable health 	<p>MoH</p>	<p>Incl. budget of MoH</p>	<p># of trainings held and who has been trained</p> <p>Protocols available at location</p> <p>Trainings held</p> <p>Staff wears PPE</p>	<p>At start of the clinical operations</p>

		<p>care waste to be managed responsibly, without harming the community or the environment.</p> <ul style="list-style-type: none"> • Staff engaged in medical waste management should wear PPE. • Staff engaged in auxiliary activities, such as food supply, medical waste management should wear PPE. • Medical waste should be treated as infectious clinical waste Category B (UN3291) [30] and handled in accordance with healthcare facility policies and local regulations 			<p>Staff wears PPE</p> <p>Records of medical waste treatment</p>	
	Risk of infection to the handlers	Segregate medical/health care waste at generation point	MoH	Incl. budget of MoH	Medical waste segregated at source to avoid double handling	monthly
	Risk of infection to the handlers due to secondary handling	Place the different types of medical/health care waste in secured bags color-coded and labelled	MoH	Incl. budget of MoH	Medical waste in secured bags which are colour coded and labelled	monthly
ESS 3: Resource Efficiency and Pollution Prevention and Management						
Construction Phase						

<p>ESS 3</p>	<p>Impacts of generation of solid waste which is the construction and demolition waste and rubble that may be generated from demolition of existing structure</p>	<ul style="list-style-type: none"> • Ensure disposal of generated solid waste at designated and authorized disposal site consistency with the local and international requirements (see WBG General EHS Guidelines)¹⁵ • Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal by the contractor – Project GRM • Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, cultivation fields, irrigation channels, natural drainage paths, wetlands and critical habitat, the existing waste management system in the area, local routes, and general aesthetic value of the area 	<p>Contractor</p>	<p>waste management costs 10,000 USD lump sum per site</p>	<p>Records of amount of solid waste disposed, where and when</p> <p>Records of Project GRM and addressed grievances</p> <p>Records of amount of solid waste disposed, where and when</p>	<p>monthly</p>
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¹⁵ WBG EHS Guidelines, Waste Management, accessed at: <https://www.ifc.org/wps/wcm/connect/456bbb17-b961-45b3-b0a7-c1bd1c7163e0/1-6%2BWaste%2BManagement.pdf?MOD=AJPERES&CVID=nPtwEW>

<p>Risk of poor sanitation facilities and sanitation conditions condition at work site</p>	<ul style="list-style-type: none"> ● Provide proper water closet toilet facilities at all long term (> 1 month) work sites. ● Do not allow water to run out at toilets. ● Maintain all toilets in clean and sanitary condition. ● Provide proper earth pit latrines at all work sites where work will be undertaken for periods of up to one month. ● Fill the latrines in once they become full and when site work is complete. ● Do not allow site workers to defecate in the open anywhere on the site or in its vicinity. ● Add the use of sanitation arrangements in toolbox talks 	<p>Contractor</p>	<p>5,000 USD</p>	<p># of water closet toilet facilities available</p> <p>% of toilets leaking</p> <p>Toilets are well maintained</p> <p># of latrines provided</p> <p>% of latrines filled</p> <p># of workers openly defecating</p> <p>Sanitary arrangements part of toolbox talk</p>	<p>monthly</p>
<p>Risk of pollution from construction wastes and water use</p>	<ul style="list-style-type: none"> ● Resource efficiency measures will be analyzed and incorporated 	<p>Contractor</p>	<p>Incl in contractor staff costs</p>	<p>Efficiency measures available</p>	<p>Commencement of project</p>
<p>Risks of demolition activity</p>	<ul style="list-style-type: none"> ● Asbestos containing materials removal should be considered as well as electrical equipment containing PCB 	<p>Contractor</p>		<p>Asbestos containing materials removed</p>	<p>monthly</p>

Operation Phase						
	Risk of indiscriminate disposal of medical waste	<ul style="list-style-type: none"> Ensure incineration of all the produced medical waste and a record of the amount incinerated kept 	MoH	Incl. budget of MoH	Record of dates and quantities incinerated	monthly
	Impacts of air emissions from incinerator	<ul style="list-style-type: none"> Waste segregation and selection including removal of the following items from waste destined for incineration: halogenated plastics, pressurized gas containers, large amounts of active chemical waste, silver salts and photographic / radiographic waste, waste with high heavy metal content, and sealed ampoules or ampoules containing heavy metals. 	MoH	Incl budget of MoH	Waste segregation and selection undertaken	monthly
	Risks of incineration residues	<ul style="list-style-type: none"> management of incineration residues such as fly ash, bottom ash and liquid effluents from flue gas cleaning as a hazardous waste (see WBG General EHS Guidelines) as they may contain high 	MoH	Incl budget of MoH	Incineration residues have been managed appropriately	monthly

		concentrations of POPS. ¹⁶				
ESS 4: Community Health and Safety						
ESS 4	Construction Phase					
	<p>Risk of increased GBV/SEAH cases and risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors by project workers</p>	<ul style="list-style-type: none"> ● Implementation and monitoring of GBV / SEA Action Plan ● GBV awareness sessions for community ● GBV awareness sessions for workers Engage a dedicated specialist to support oversight and management of these risks ● Workers to sign CoC 	PIU	Incl in PIU staff and travel costs	<p>Activities under GBV/SEA Action Plan implemented</p> <p># of GBV awareness sessions</p> <p># of sessions</p> <p># of specialists engagement</p> <p>% of workers that have signed CoC</p>	monthly
	<p>Risk of spread of communicable diseases (SIs , HIV/AIDS, COVID-19 etc..) between workers and the community</p>	<ul style="list-style-type: none"> ● Community awareness sessions on communicable diseases ● Implement COVID-19 protection measures 	PIU	Incl in PIU staff and travel costs	<p># of community sensitization</p> <p>% of workers that have signed CoC</p> <p>% or works with access to face masks and sanitizer</p>	monthly

¹⁶ See for WHO standards / specifications: <https://www.who.int/teams/health-product-and-policy-standards/standards-and-specifications>

Risk of exposure of community members to physical hazards on project sites.	<ul style="list-style-type: none"> • Undertake safety precautions to address safety hazards for the nearby community, • Sensitize the local community on the activity of type project and inform them about construction risks 	Contractor	Inc in Contractor budget	# of sensitization measures	At commencement of activity
Risk of traffic and road safety	<ul style="list-style-type: none"> • Safety/warning signage, safety barrier around the construction site, and safe driving practices (see WBG EHS Guidelines on Traffic Safety) 	Contractor	Inc in Contractor budget	Signage available	monthly
Impacts of dust, air pollution and noise generation	<ul style="list-style-type: none"> • High level maintenance of the vehicles to reduce the vibrations • Selecting equipment with lower sound power levels • Installing suitable mufflers on engine exhausts and compressor components • equipment casing • Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during 	Contractor	Inc in Contractor budget	<p>% of vehicles well maintained</p> <p>% of engine exhausts with mufflers installed</p> <p>% of activities implemented during the days</p>	At commencement of activity

		periods of the day that will result in least disturbance.				
Operation Phase						
Risks of carriage of healthcare waste through public streets can be a risk in case of an accident or more spill of health care waste	<ul style="list-style-type: none"> Transportation of medical waste will be done according to the WHO specifications which guides that during transportation, a defined route is used always and the vehicle is well labelled to indicate its transporting hazardous materials. Ensure the quantities of medical waste transported is recorded before leaving the HCF and also recorded at incineration point to account for every medical waste that is moved from the HCF. 	MoH	Incl. budget of MoH	<p># of times the defined route for transportation of medical waste and the vehicle properly labelled</p> <p># of times records are made available</p>	monthly	
Risk of poor sanitation conditions at the HCF leading to discomfort and poor aesthetic values	<ul style="list-style-type: none"> Provide cleaning staff with adequate cleaning equipment, materials and disinfectant. Provide adequate facilities to disinfect the cleaning equipment and dispose of the used consumables in a safe manner; 	MoH	Incl. budget of MoH	<p>Cleaning equipment available</p> <p>Effective cleaning system</p> <p>% of cleaners trained</p>	monthly	

		<ul style="list-style-type: none"> Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas. Train cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials) 				
ESS 10: Stakeholder Engagement and Information Disclosure						
ESS 10	Preparation Phase					
	Risks of poor access to beneficiaries lead to less meaningful community engagements and difficulty in monitoring for social harm	<ul style="list-style-type: none"> Implementation and monitoring of GRM 	PIU	PIU GRM costs	% of complaints filed have been addressed	monthly
	Risks of lack of information on access to GRM leads to lack of accountability	<ul style="list-style-type: none"> Awareness raising on GRM 	PIU	PIU budget for GRM	# of awareness sessions of GRM	quarterly
	Lack of information disclosure leads to lack of transparency and suspicions of mismanagement of the sub project	<ul style="list-style-type: none"> Conduct in- depth community engagement, providing information on the sub project Implement SEP 	PIU	PIU budget for stakeholder engagement	# of community engagement sessions held	quarterly

7. Institutional Arrangements and Responsibilities

7.1 Government Institutions

The work implementation will be managed by the Project Implementation Unit (PIU) embedded within the SCRIP institutional structures. The PIU will be contracting a construction company directly to implement construction works. The construction company will implement the project including all Environmental and Social (E&S) mitigation measures defined in this ESMP.

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

Table 5 Institutional partners' responsibilities

Project Implementation Unit - PIU	<p>The application of mitigation measures required under this ESMP is the sole responsibility of the PIU. However, since actual construction works will be carried out by the private entity, the PIU will ensure that implementation of the ESMP is incorporated in the Request for Proposals (RfPs) and the costs are integrated in the Bill of Quantities (BoQs), and subsequently in the legal agreement between the construction company and the PIU. The agreement will also include the requirement for the contractor to develop a C-ESMP, which includes a health and safety plan, in accordance with this ESMP. The C-ESMP will be reviewed and approved by the PIU Environmental and Social Safeguards Specialists. The PIU is responsible to instruct, observe and monitor its contractors against the ESMP provisions. The PIU should make sure that corrective actions are applied by the contractors, when necessary.</p> <p>The PIU can also undertake the monitoring itself if deemed necessary. The PIU will request for any violations to be corrected by the Constructor and monitor the actions and undertakings in correcting violations.</p>
State Project Team - SPT	<p>The SPT's Environmental & Social Safeguards Specialist will monitor the implementation of risk mitigation measures by the construction company. The monitoring will be supported by the PIU / SPT Engineers and the Community Consultation Specialist. Environmental and social monitoring reports will be prepared by the SPT and submitted to the PIU every month throughout the project duration.</p>
Ministry of Public Works (MoPW)	<p>MoPW - the responsible State Ministry on all infrastructure development and maintenance has been engaged in the design development consultation and the certification process. The MoPW's technical staff will be engaged in the supervision of the work implementation by the</p>

	Contractor.
District Commissioner	The District Commissioner (Municipality) representing the local community and the interest will be engaged in the day to day coordination of the work implementation by the Contractor. The District Commissioner will be specifically involved in facilitating stakeholder engagements, assisting the Contractor in the recruitment of local workers and ensuring the security to the Contract staff and the supervision teams. The District Commissioner will be the first point of contact for the local communities for raising construction activities related inquiries.
UNOPS	UNOPS Engineers and Safeguard team will be available to provide advisory level support to the PIU during the works implementation on technical and safeguard compliance related matters.

7.2 Contractor

The Contractor is responsible for complying with requirements for all field activities covered by this ESMP. Contractors to the SPT/PIU are also responsible for the actions of any subcontractors they may engage. Subcontractors also have to comply with all E&S standards as laid out in this ESMP. Contractor’s responsibilities include:

- Ensure that all operations comply with the environmental and social standards laid out in this ESMP and in the Project’s ESMF.
- Ensure that the control measures provided for in the ESMP are both understood and implemented by site personnel.
- Comply with accident and incident reporting as laid out in the ESMF. All severe incidents must be reported to the PIU within 48 hours of occurrence.
- Comply with chance find procedures
- Set up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies.
- Ensure compliance with all mitigation measures in this ESMP.
- Monitor the ESMP implementation, against the monitoring indicators laid out in the ESMP Table.
- Participate in Community Consultative Meetings.
- Identify additional significant matters pertaining to environmental and social compliance.
- Liaise with the SPT/PIU Environmental and Social Safeguards Specialists on the need for corrective action in the event of unexpected environmental or social problems emerging during the course of operations.
- Communicate with all of the contractor's staff regarding environmental and social compliance requirements and other matters of importance.

- Identify additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Prepare of reports on all aspects of environmental and social compliance.
- Maintain lists of all workers, including their age and gender.
- Maintain a workers' grievance mechanism.
- Prepare and maintain an OHS Plan.
- Provide training to all workers on OHS Plan.
- Ensure signing of CoC by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.

The contractor is obliged to implement this ESMP with all risk mitigation measures assigned to it.

E&S Safeguards or Environmental Health and Safety (EHS) Specialist: The contractor will deploy an E&S or EHS Specialist as an addition to the team to ensure operationalization of this ESMP, including monitoring, supervision and reporting on mitigation measures. The key tasks of the Specialist include:

- a) Prepare and submit the C-ESMP to the SPT/PIU
- b) Ensure PPE for workers is available and workers are trained in its use
- c) Provide OHS training to all workers, based on the OHS Plan
- d) Ensure health and safety of all workers at the construction site
- e) If necessary, stop the works to ensure safety
- f) Maintain records of accidents and incidents and ensure appropriate reporting of incidents to the PIU/SPT
- g) Ensure waste management procedures are followed closely
- h) Ensure availability of water and sanitation facilities for all workers at site and at the camp site
- i) Conduct toolbox talks for workers
- j) Train all workers in the CoC and ensure that CoC is signed by every worker before commencement of their assignment.
- k) Liaise closely with the SPT/PIU Teams on training workers on GBV issues, as well as community awareness on GBV
- l) Maintain workers' lists indicating age and gender
- m) Liaise closely with the SPT/PIU Teams on the implementation of Project GRM
- n) Maintain records of workers' GRM

8. Reporting on ESMP Compliance

The PIU will prepare periodic monitoring reports, including inputs from the Contractor and the SPT, on the status of implementation of ESMP. The reports will be submitted to World Bank for their review and feedback as part of the PIU's general Quarterly report to the Bank. Details of these reports and their content are given in **Error! Reference source not found.** below. A template for an Environmental and Social Monitoring report is included in Annex 2.

Table 6 ESMP Monitoring and Compliance Reports

#	Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
1	ESHS Monitoring Report to PIU	<p>Compliance status of the Project with the environmental and social mitigation and monitoring measures. The report should cover:</p> <ul style="list-style-type: none"> • environmental incidents; • health and safety incidents, • health and safety supervision: • Usage of PPEs by workers • worker accommodations for foreign workers; • highlights of inspection • Training conducted and workers participated • Workers grievances • Community grievances • Chance find (if any) 	Monthly	Contractor/SPT
2	ESMP Monitoring Report to WB	Compliance status of overall Project with ESMP requirements	Quarterly	PIU
3	Incident Reports	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to address the future recurrence of this event	<p>Initial investigation report for severe incidents within 24 hours.</p> <p>Detailed Investigation Report within ten days</p>	PIU (contractor/SPT to PIU_

9. Capacity Building and Training

The proper implementation of the ESMP is highly dependent on the available existing capacity and awareness of the PIU, the SPT and the contractors' staff, the surrounding community and the concerned stakeholders.

Training workshops are required to increase the environmental awareness of all individuals concerned with the Project and to train and follow up with the workers who are specifically involved in the site operation.

On-site workers should receive appropriate training to undertake the duties of implementing the necessary mitigation measures. The training workshops should cover at least the following issues:

- Occupational and public health and safety.
- Mitigation measures to be applied.
- GBV/SEA/SH prevention
- HIV/AIDS prevention
- Proper handling and storage of hazardous material and wastes.
- Spill contingency plans
- Accidents and emergency plans
- Roll-out of GRM among workers and communities
- Appropriate segregation, transportation, final disposal of solid waste and fire safety.

This will be achieved by small workshops conducted in the induction phase for the workers. The induction training will include familiarization with the workers' GRM, Project GRM, CoC, GBV/SEA/SH, HIV/AIDS prevention, COVID-19 measures, and other toolbox talks as mentioned above in the ESMP. During the construction phase, refresher trainings will be held. While some training will be provided by the contractor, the PIU has assessed that training on GBV/SEA/SH and GRM should be conducted by the PIU directly, given a potential lack of capacity among contractors.

10. Stakeholder Engagement

The preparation of the ESMP, the project selection and design was highly dependent on stakeholder consultations, conducted as per the SCRP Stakeholder Engagement Plan (SEP).

Initially, the PIU and UNOPS teams traveled to Hirshabelle State on 3 March 2021, for a joint assessment mission to identify flood-affected infrastructures through broad consultations of local authorities and communities. The team visited Beledweyne town. At this point, the specific site was not yet decided on and the objective was to identify the key needs of the local communities and to allow for the prioritization of specific flood-affected infrastructure. During this field assessment mission, district and community level consultations were held in Hirshabelle, including in Beledweyne town. Key topics covered during the consultations included the provision of all sub-project related information to affected communities, ensuring coordination between the SCRP and local authorities and community structures, receive feedback and comments on the identification of projects, receive feedback and comments on the potential environmental and social risks of the identified projects and planned mitigation measures, and discuss investment sustainability, as well as familiarize communities with the Project GRM. In addition, after the consultations, the SCRP provided project information through its website, flyers directly distributed in communities, and radio shows. The list of attendees is included as Annex 1 of this document. The consultations consisted of separate sessions with different types of stakeholders, including local authorities (the Governor of Hiran Region Mr. Ali Jeyte, the Beledweyn District Commissioner Mr. Ali Kediye, the Mayor of Hiran , Ms. Nadar Tabaax, Security Chiefs, Flood Protection Committee members, officials from various Ministries), youth and women's representatives, community elders, business people and religious leaders.

During the sessions with the district administration, it was stated that Beledweyne is the most flood affected city/district in Somalia and significant amounts of its infrastructure - including roads, hospitals, houses and schools - were destroyed by recurrent floods, caused by the overflowing of the river. Participants in the meeting articulated their immediate priority needs as follows:

1. Flood Risk Management
2. Rehabilitation of roads
3. Rehabilitation and construction of health facilities
4. Rehabilitation of the water infrastructure

Sessions with community members: The team met with elders of the local flood-affected communities, who informed the team that Beledweyne is a city destroyed by recurrent floods and has been affected by recurrent floods for many years. they stated that NGOs operating in the area do not play their role efficiently and are incapable of addressing these recurrent floods and affects.

Session with representatives of the agro-pastoralist communities: Participants said that every time floods occur, their farms and crops are destroyed, which affects livelihoods of many in

Beledweyne. They also stated that the farming equipment is affected by the floods and the roads that lead from and to the farms and to the city – which are crucial to transport crops and vegetables to the city in order to be able to sell the produce - become severely flooded. Apart from rehabilitation of specific road infrastructure, they identified two HCF as priorities for rehabilitation and/or construction of new facility depending on the status of the infrastructure and the environment.

Session with representatives of the youth community in Beledweyne. Youth representatives stated that recurrent floods in Beledweyne have caused their employment to be halted, which has affected their and their family's livelihoods severely. They told the teams that whenever severe flooding occurs they are displaced from their villages and neighborhoods until the water eventually dries up, which can take up to 3 months. The youth representatives requested that canals be built around the river to help the stream of water and the creation of cash-for-work for the youth when construction takes place.

Session with representatives of the IDP communities: The most vulnerable members of Beledweyne are the IDPs, who mostly have fled from local level conflicts and from Al-Shabaab, and have been seeking safe haven in Beledweyne. Some of them have been displaced again due to the flooding events and their shelters have been destroyed. Representatives of the IDP community, the most vulnerable communities in Beledweyne stated that there was no assistance in Beledweyne and when they are displaced, there is no access to health care – however insufficient it may be. The same groups also stated that wells have been affected by floods and outbreaks have happened, previously such as cholera which devastates vulnerable communities who don't have access to sufficient medical care.

Once the rehabilitation of Sigaalow was decided on, follow-on site visits and stakeholder engagements were undertaken to consult on issues including patient numbers, facility operations, current support infrastructure, services being provided, confirmation of client design input on requirements, including environmental and social risks and impacts, approval of site plan and floor plan layout, etc... (see Annex 1).

11. Grievance Redress Mechanism

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.¹⁷ One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances’.¹⁸ This Project GRM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SCRP provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the SCRP. For further details, refer to the GRM Manual.

As per World Bank standards, the GRM operates in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines (see GBV/SEAH and Child Protection Prevention and Response Plan in the ESMF¹⁹). It also operates in addition to specific workers’ grievance redress mechanisms, which are laid out in the LMP (also part of the ESMF).

The GRM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

The GRM Value Chain is presented in Annex 2.

¹⁷ Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labour Management Plan (LMP). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV grievance redress mechanisms, which will be defined in a separate GBV/SEA and Child Protection Risks Action Plan.

¹⁸ World Bank, Environmental and Social Framework, 2018, p. 131.

¹⁹ Somali Crisis Recovery Project (SCRP), Environmental and Social Management Framework, amended August 2021

12. Implementation Budget

Table Implementation Budget

	Required Resources	Costs in USD
PIU – Monitoring of ESMP		
1.	Human Resources: 1 Environmental, 1 Social Safeguards Specialist	PIU staff costs
2.	1 GBV Specialist (GBV training and GRM)	PIU staff costs
3.	1 Security Specialist	PIU staff costs
4.	1 Stakeholder Consultation Specialist	PIU staff costs
5.	1 GRM Specialist (GRM awareness)	PIU staff costs
6.	Logistics / Travel	PIU travel budget
Grievance Redress Mechanism hotline		
7.	Hotline and other mechanisms	PIU GRM budget
8.	GBV/SEAH reporting mechanisms	PIU staff costs
Implementation of Risk Mitigation Measures Contractor		
9.	Human Resources 1 EHS Specialist x 4 months	8000
10.	Cost of PPE	2000
11.	Cost of OHS and other Training	1000
13.	Construction Waste Disposal	10000
14.	Safety Signages	1000
15.	Community engagement	Included in staff costs
16.	Latrines	5000
17.	Security Costs	6500 +tbd
	TOTAL	27 000

13. Conclusion

The Sigalaw MCH re-construction was identified as one of priority projects by Beledweyne citizens. This will improve on the medical service delivery which currently is non-existent.

This ESMP was prepared to help mitigate potential environmental and social risks and impacts. The risks and impacts for construction/rehabilitation of the health facility was classified as moderate, mostly consisting of typical civil works related risks and impacts. There is no land and resettlement issues on proposed site.

The ESMP is in particular prepared to help guide the PIU, SPT and the construction company on environmental and social risk mitigation measures to be implemented throughout the works to ensure compliance with all SCRPs E&S instruments, World Bank Environmental and Social Standards (ESSs) and local legislation.

References

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12. SCRP, Environmental and Social Management Framework, amended August 2021.
13. SCRP, Stakeholder Engagement Plan, amended 26 April 2021
14. Thulstrup, A. W. et al., 'Uncovering the challenges of domestic energy access in the context of weather and climate extremes in Somalia', *Weather and Climate Extremes*, Sep. 2018.
15. UNEP 2005.
16. Williams and Funk , *Climate Dynamics*, 2011 pp. 2417–35.
17. World Bank, Environmental and Social Framework, 2018, p. 131.

Annex 1: Stakeholder Consultations

Attached is a list of all stakeholders consulted during the first prioritization field mission.

Stakeholder Meeting Participants In Baladweyne, HIRSHABELE (March 3, 2021)

SR.NO	NAMES	DESIGNATION	MOBILE NUMBER
1	Nadar Tabaax Maalin	Mayor of beledweyn	0615551582
2	Ali Jeyle Osman	Governor	0612531079
3	Abukar Abdullahi	Deputy governor	0615081114
4	Osman Dhicisow	District commissioner	0615508028
5	Muhumad Ali	Deputy of district commissioner	0615724503
6	Abdirisq Hussein Ali	Director	0615081522
7	Eng Abdirashid Ali Omar	Flood management committee	0612678254
8	Abdi Muhin Elmi	Regional Spokesman	0615897811
9	Igal Abdalle Elmi	Youth group	0615027980
10	Sharif Mohamed Fidow	Flood management committee	0615571689
11	Ifrah Ibrahim Hared	Women group	0615268315
12	Hanaan Omar Arte	Women group	061508049
13	Ismail Abdalle Adan	Deputy Director of the Lower House Land Department	0615757878
14	Mohamed Abdi Adan	Elders group	0618305119
15	Mohamed Fidow Adawe	Elders group	0615523944
16	Awil Mohamed Jibril	Ministry of Energy and Water Coordinator	0615859980
17	Eng. Khalid abdulnasir	Civil Engineer	0615764977
18	Adam Abdi Adam	Senior project coordinator	0615918230
19	Eng. Abdinasir Abdulahi Moahamed	Ministry of public works Engineer	0615859247
20	Eng. Abdulkadir Abukar Igal	Mistry of water and energy Water Engineer	615212806
21	Eng. Abdinur Farah	Ministry of finance Project Engineer	0617895176

The Following consultations were undertaken specifically for Sigaalow MCH:

Date	Type of Consultation	Stakeholders Consulted	Issues discussed
2 - 6 March 2021	Stakeholder consultation and initial Assessment (field visit)	Governor of Hiran Region Mr. Ali Jeyte, the Beledweyne District Commissioner Mr. Ali Kediye, the Mayor of Hiran Ms. Nadar Tabaax, Security Chiefs, Flood Protection Committee members, officials from various Ministries, youth and women's representatives, community elders, business people and religious leaders	Flood risk to the community Prioritization of infrastructure for rehabilitation works Security assessment and accessibility Beneficiaries community - potential impact of reconstruction of the health facility Please refer to PIU - UNOPS joint Assessment Reports
1 May 2021	Design Questionnaire Input (Via email & Phone)	District Medical Office (DMO). Health Facility Operator (Relief International)	Collected data and information on patient numbers, facility operations, current support infrastructure, services being provided etc as input to design development.
22 August 2021	DMO / Operator Consultations (virtual)	District Medical Office (DMO). Health Facility Operator Relief International	Confirm client design input on requirements including environmental and social risks and impacts
26 August 2021	DMO/ Operator Consultations (virtual)	District Medical Office (DMO). Health Facility Operator Relief International	Consultations on Preliminary layout
14 September 2021	Architectural Site Analysis and Inventory (Field Visit)	District Medical Office (DMO). Health Facility Operator Relief International	Confirmation of site infrastructure services, building materials availability, discussion of proposed design. Please refer to Site Analysis & Inventory Report for Sigaalow MCH
9 November 2021	DMO review of final site plan and floor plan layout	District Medical Officer (DMO)	Approval of site plan and floor plan layout
22 December 2021	World bank Review (via email)	World Bank Health Technical Lead (Dr. Bernard Olayo)	Review of Facility architectural design for Health requirements.

In progress as of 20 January 2022	Client Review: Technical Review of the Detailed Design Review (via email)	Hirshabelle State (Ministry of Public Works) Engineers	Detailed design review i.e. Review of detailed design drawings, specifications document, Design reports
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Annex 2: GRM

This annex describes the Project GRM’s objectives and the steps of the GRM Value Chain in more detail.

GRM Objectives

The key objective of the GRM is to establish a prompt, easy to understand, consistent and respectful mechanism to support the receiving, investigating and responding to complaints or grievances from project stakeholders. It is designed to offer project stakeholders an opportunity to seek and receive grievance redress; to strengthen the project’s team ability to identify, track, resolve and refer eligible grievances; and to enhance the Project’s development results and outcomes. The GRM is expected to contribute to continuous improvement in performance of the SCRIP through an analysis of trends and lessons learned. The GRM does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

The SCRIP has contracted a GRM Focal Point, Halima Farah. It further has put in place a hotline with the number ‘337’.

Types of Complaints Expected

Table 7 Types of complaints expected

Categories of Grievances
1. Basic information
- Access to information
- Correction and deletion of untrue or misleading information that affects the person
2. Ethics and conduct
- Government entities and staff
- Implementing Partner staff
4. Violation and breach of codes of ethics
- Violation of codes of ethics;
- Breach of the code of ethics by government officers:
- Breach of Code of Conduct and Ethics by staff of Implementing Partners
5. Violation of human rights and fundamental freedoms
- Gender equality and general equality matters.

- Equality and freedom from discrimination (Equality -every person; Equality of men and women to opportunities in political, economic, cultural and social)
- Economic and Social Rights (health, sanitation, freedom from hunger, adequate and quality food, clean safe and adequate water, social security, education, emergency medical treatment)
- Non-discrimination of special needs groups
6. Corruption and Economic crimes
- Unethical conduct
7. Labor and working conditions
- Termination/Summary Dismissal,
- Breach of Employment Contract Terms
- Conflicts with Trade Unions
- Work Injury
- Discrimination
- Sexual Harassment
- Remuneration
- Wrongful termination
- Suspension
- Waiver of Claims
8. Environmental compliance violations
- Violation of environmental standards laid out in the ESIA, ESMPs, and ESMF
9. Occupational Health and Safety (OHS)
- Violation of occupational health and safety measures and standards laid out in the ESMF, ESMPs
11. Gender-Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH)
- Gender based violence committed by project personnel or any worker on the Project, or GBV committed in relation to the Project
- Sexual Exploitation and Abuse committed by Project staff or any worker of an IP associated to the Project
- Sexual Harassment committed by Project staff or any worker of an IP associated to the Project

Available Channels

A phone number for a hotline operator: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator is available from 8.00 am to 5.00 pm every day through a toll-free number. The hotline operator is set up and managed

by the Project Implementation Unit (PIU). Any concerned party can call the hotline number and file a grievance with the Project. Hotline Operators will respond in Somali or English.

A help desk must be set up by the respective IP during the implementation of sub-project activities in an area.²⁰ They should be manned by the IP staff, especially its community project facilitators, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regards to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk.

Relevant assigned personnel available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the contractor, IP or the local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box.

A suggestion box must be installed at the nearest local administration office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in writing. Suggestion Boxes are installed at the closest official administration office in the sub project area. Boxes are clearly marked as SCRIP-related feedback and grievance mechanism.

Processing Steps

Step 1: Grievance Uptake

Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

GBV/SEA/SH-related Grievance: Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on GBV/SEA/SH-related grievances. No grievance uptake mechanism cannot reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of GBV/SEA/SH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centered approach from mandatory reporting.

Step 2: Sort and Process

²⁰ The help desk must be budgeted by the IP, the manning of the help desk will depend on the nature of the activity

All registered grievances will be transferred to the GRM Focal Point at the respective IP at state or national level – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM focal point will categorize the complaint according the table above (section on ‘Categorization of Grievance’). Worker-related grievances will be handed over to a workers’ GRM (see below). Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the IP has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GRM operators and relevant project staff (see below).

For grievances handled under the general Project GRM, the GRM Focal Point will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based on the priority of the grievance, and make a judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g. at the court). The focal point should offer the complainant option/s for resolution of their grievance.

GBV/SEA/SH: All reporting will limit information in accordance with the survivor’s wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded and the case will be considered closed.

Step 3: Acknowledgement and Follow-Up

The respective IP will decide whether a grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

Step 4: Verify, Investigate and Act

The IP, the GRM Focal Point, will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redress action and plan.

Table 8 Actions Required

Grievance Category	Required Action
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Queries, comments and suggestions	Acknowledgement / Clarification
Complaints and concerns which do not require formal investigation	Grievances should be handled and resolved by the immediate manager within the GRM structure, e.g. the GRM Focal Point or a dedicated staff. The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.
Complaints and concerns that involve allegations that require investigation or interventions of a different kind	As appropriate, conduct verification, negotiation, mediation or arbitration, coordination with respective authorities, decision-making, escalation to judicial or administrative institutions, proposed solutions, implementation of agreed actions, etc... The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.

Step 5: Monitor, Evaluate and Provide Feedback

The IP/GRM Focal Point will provide feedback to GRM users and the public at large about:

- results of investigations;
- actions taken;
- why GRM is important;
- enhance the visibility of the GRM among beneficiaries; and
- increase in users' trust in the GRM

Response Times

Table 9 Response Times

Type of Case	Actions Required	Response Required
Straight-forward cases with little anticipated complications	minimal checks and consultations	Acknowledge reception of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if need be, and communicate outcomes and next steps based on outcomes 1-3 days
Cases that require some minimal processes	delete misleading information, collect information, analyze existing information, prepare communication materials to disclose delayed information, clarify existing information, and correct misleading information	Acknowledge reception of the grievance, detail the steps to follow, and provide the appropriate practical timelines 7 -14 days

Cases that requires investigation	access and review of relevant documentation (reports, policy documentation), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches	Acknowledge reception of the grievance, provide follow-up steps and set timelines for a comprehensive response 14 to 21 days
Cases that require escalation to higher SCRP implementation level	Transfer case to relevant higher level (e.g. state-level or national HQ of IP; PIU)	Acknowledge reception of the grievance, provide the need for escalation of the grievance to the next project implementation level, and set timelines for a comprehensive response 7-14 days
Cases that require referral to other institutions	Transfer case to relevant institution (National Police Service, World Bank)	Acknowledge reception of the grievance, provide the need for referral of the grievance to an appropriate institution, and set timelines for a comprehensive response on referral progress 7 - 21days

Other Redressal options

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB’s independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

Annex 3: Environmental and Social Monitoring Template

This annex present a template that should be used for the E&S monitoring process by the SPT/PIU monitoring team

Table 10 E&S Monitoring Template

Risks and Impacts	Mitigation Measures	Indicators	Responsibility	Monitoring Frequency	Findings/Observations	Corrective Action

Annex 4: Code of Conduct for Workers

International Labor Conventions and Recommendations: The International Labor Standards (i.e., Conventions and Recommendations) have served as the foundation on which much of this Code of Conduct is based.

1. Scope of Application:

It is expected that these principles apply to contractors, suppliers and their employees, parent, subsidiary or affiliate entities and subcontractors. It is expected that contractors ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all. This Code of Conduct provides the minimum standards expected. In addition, contractors should note that certain provisions of this Code of Conduct will be binding in the event the contractor is awarded a contract by the Project pursuant to the terms and conditions of any such contract. Failure to comply with certain provisions may also preclude contractors from being eligible for a contract award.

2. Continuous Improvement:

The provisions as set forth in this Code of Conduct provide the minimum standards expected of contractors. It is expected that contractors strive to exceed both international and industry best practices. It is also expected that contractors encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct. It is recognized that reaching some of the standards established in this Code of Conduct is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions accordingly.

3. Management, Monitoring and Evaluation:

It is the expectation that contractors, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. It is expected that contractors will establish and maintain appropriate management systems related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. Contractors participants in the Global Compact are strongly encouraged to operationalize its principles and to communicate their progress annually to stakeholders.

Labor:

4. Freedom of Association and Collective Bargaining: It is expected that contractors recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

5. Forced or Compulsory Labor: It is expected that contractors prohibit forced or compulsory labor in all its forms.

6. Child Labor: It is expected that contractors do not employ: (a) children below 14 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.

7. Discrimination: It is expected that contractors ensure equality of opportunity and treatment in respect to employment and occupation without discrimination on grounds of race, colour, sex, religion, political opinion, national extraction or social origin and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place. It is expected that contractors take all appropriate measures to ensure that neither themselves nor their parent, subsidiary, affiliate entities or their subcontractors are engaged in any gender-based or other discriminatory employment practices, including those relating to recruitment, promotion, training, remuneration and benefits.

8. Wages, Working Hours and Other Conditions of Work: It is expected that contractors ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned. Suppliers should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement and suppliers should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by suppliers should be not less favorable than the best conditions prevailing locally (e.g. collective agreements covering a substantial proportion of employers and workers / arbitration awards / applicable laws or regulations) for work of the same character performed in the trade or industry concerned in the area where work is carried out.

9. Health and Safety: It is expected that contractors ensure, so far as is reasonably practicable, that: (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health; (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

Human Rights:

10. Human Rights: It is expected that contractors support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

11. Harassment, Harsh or Inhumane Treatment: It is expected that contractors create and maintain an environment that treats all employees with dignity and respect. It is further expected that contractors, as well as their parent, subsidiary and affiliated entities along with any subcontractors, will neither use or engage in, nor allow their employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse violate universally recognized international legal norms and standards and are unacceptable behavior and prohibited conduct. Prior to entering into agreements, contractors are informed of the standards of conduct with respect to the prohibition of sexual exploitation and abuse, expected. Such standards include, but are not limited to, the prohibition of: (i) engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent, (ii) exchanging any money, employment, goods, services, or other things of value, for sex, and/or (iii) engaging in any sexual activity that is exploitive or degrading to any person. It is expected that contractors take all appropriate measures to prohibit their employees or other persons engaged by the suppliers, from engaging in sexual exploitation and abuse. It is also expected that contractors create and maintain an environment that prevents sexual exploitation and abuse. Contracts will contain provisions concerning a supplier's obligation to take appropriate measures to prevent sexual exploitation and abuse. The failure by a supplier to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action when sexual exploitation or abuse has occurred, constitute grounds for termination of any agreement. Moreover, no harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

12. Mines: It is expected that contractors do not to engage in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

Environment:

13. Environmental: It is expected that contractors have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

14. Chemical and Hazardous Materials: Chemical and other materials posing a hazard if released into the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

15. Wastewater and Solid Waste: Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

16. Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be

characterized, monitored, controlled and treated as required prior to discharge or disposal.

17. Minimize Waste, Maximize Recycling: Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Ethical conduct:

18. Corruption: It is expected that contractors adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery.

19. Conflict of Interest: It is expected that contractors disclose any situation that may appear as a conflict of interest, and disclose if any official or professional under contract may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

20. Gifts and Hospitality: No invitations to sporting or cultural events should be accepted, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners. It is expected that contractors do not offer any benefit such as free goods or services, employment or sales opportunity to staff members in order to facilitate the contractors' business with the Project entities.

21. Post-employment restrictions: Post-employment restrictions may apply to staff in service and former staff members who participated in the procurement process, if such persons had prior professional dealings with suppliers. Contractors are expected to refrain from offering employment to any such person for a period of one year following separation from service.