



GOVERNMENT OF SOMALILAND

**MINISTRY OF INFORMATION COMMUNICATION AND TECHNOLOGY
(MICT)**

**EASTERN AFRICA REGIONAL DIGITAL INTEGRATION PROJECT (EA-RDIP)
SERIES OF PROJECTS (SOP) PHASE I**

***ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) REPORT
FOR MICT OFFICE CONSTRUCTION SUB-PROJECT***

February 2026

Contents

Contents.....	ii
EXECUTIVE SUMMARY	1
1. INTRODUCTION	4
1.1. Project Background Information	4
1.1.1. Project Development Objectives and Components	5
1.1.2. EARDIP Components	5
1.1.3. <i>Component 1: Connectivity market development and integration</i>	6
1.1.4. <i>Component 2: Data market development and integration</i>	7
1.1.5. <i>Component 3: E-service market development and integration</i>	8
1.1.6. <i>Component 4: Project Management and Implementation Support</i>	9
1.1.7. Purpose of the ESMP	10
1.1.8. Methodology	11
2. SUB-PROJECT DESCRIPTION.....	12
2.1. Sub-project Activities	12
2.1.1. Pre-construction Phase	12
2.1.2. Construction Phase.....	14
Policy, Legislative and Institutional frameworks.....	15
2.2. Somaliland National legislation, policies and Laws.....	15
2.2.1. National Environmental regulations, policies and procedures	15
2.2.2. National Social and GBV regulations, policies and procedures.....	18
2.3. World Bank Environmental and Social standards and guidelines	21
2.4. Applicable World Bank Group Environmental, Health and Safety (EHS) Guidelines	23
2.5. Good International Industry Practices (GIIP)	24
3. BASELINE INFORMATION	27
3.1. Physical Environment.....	27
4. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS.....	34
4.1. Environmental Risks and Impacts	34
5. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS	35
5.1. Social Risks and Impacts.....	35
5.2. Environmental Risks and Impacts	35
6. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP).....	37
7. MONITORING AND REPORTING.....	49

7.1.	Objectives of Monitoring.....	49
7.2.	Internal Monitoring and Reporting.....	49
7.3.	World Bank Supervision	50
8.	INSTITUTIONAL IMPLEMENTATION ARRANGEMENTS AND RESPONSIBILITIES	53
8.1.1.	E&S Performance Meetings.....	57
8.1.2.	Review and Approval of Contractor Site-Specific E&S plans.....	57
8.1.3.	Kickoff Meeting.....	57
9.	REPORTING AND MONITORING ON ESMP COMPLIANCE.....	59
10.	STAKEHOLDER ENGAGEMENT.....	60
11.	CAPACITY BUILDING AND TRAINING	67
12.	IMPLEMENTATION BUDGET.....	70
13.	GRIEVANCE REDRESS MECHANISMS	71
13.1.	Overview	71
13.2.	Channels for Reporting.....	71
14.	CONCLUSION AND RECOMMENDATIONS.....	73
14.1.	CONCLUSIONS	73
14.2.	Recommendations	73
15.	References.....	74
15.1.	ANNEX 1- ENVIRONMENTAL AND SOCIAL SCREENING MATRIX	75
15.2.	ANNEX 2 -CULTURAL AND CHANCE FIND PROCEDURES:	82
15.3.	ANNEX 3 - CONTRACTORS ENVIRONMENTAL AND SOCIAL AND MANAGEMENT PLAN (C-ESMP) CONTENTS	83
15.4.	ANNEX 4 - LAND OWNERSHIP	85
15.5.	ANNEX 5 - CONSULTATION ATTENDANCE SHEETS.....	88
15.6.	ANNEX 6 - STAKEHOLDER ENGAGEMENT MEETING MINUTES:	88
15.7.	ANNEX 7 - BUILDING SCHEME	92

List of Tables

Table 1:	EA-RDIP Project components.....	5
Table 2:	sub-project site location.....	15
Table 3:	Positive E&S Risks and Impacts	37
Table 4:	Anticipated Negative Environmental and social Impacts.....	41
Table 5:	ESMP Monitoring and Compliance Reporting.....	51
Table 6:	Institutional Implementation arrangements and Responsibilities	53
Table 7:	Stakeholder Mapping Table.....	60

Table 8: Stakeholder feedback and PIU response.....	63
Table 9: Stakeholder needs	64
Table 10: Consultation stages	65
Table 11: Information disclosure	66
Table 12: Communication measures.....	66
Table 13: Stakeholder Engagment objectives, method and target group	68
Table 14: The PIU Budget for ESMP Monitoring and Training for the EARDIP sub-project.....	70

List of figures

Figure 1:below provided Priority fiber optic links proposed in Somaliland.	10
Figure 2: shows the site location.	15
Figure 3: The map shows the Physical environment of Hargeisa district	31
Figure 4:: Shows stakeholder nearby stakeholders	63

Acronym	
CERT	Computer Emergency Response Team
CoC	Code of Conduct
CN	Construction
CRPD	Convention on the Rights of Persons with Disabilities
C-ESMP	Contractor Environmental and Social Management Plan
DM	Demolition
DS	Design
EA-RDIP	Eastern Africa Regional Digital Integration Project
EHS	Environmental, Health and Safety
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
FAO	Food and Agriculture Organization
GBV	Gender-Based Violence

GRM	Grievance Redress Mechanism
HR	Human Resources
IBC	International Building Code
ICDF	International Cooperation and Development Fund
ICPAC	IGAD Climate Prediction and Applications Centre
IDP	Internally Displaced Persons
IFC	International Finance Corporation
ILO	International Labour Organization
ISO	International Organization for Standardization
LS	Lump Sum
MICT	Ministry of Information Communication and Technology
NFPA	National Fire Protection Association
NDP	National Development Plan
NREN	National Research and Education Network
OHS	Occupational Health and Safety
OECD	Organisation for Economic Co-operation and Development
OP	Operation
PDO	Project Development Objective
PIU	Project Implementation Unit
REN	Research and Education Network
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Security Management Plan
SOC	Security Operations Center
SOP	Series of Projects

SWALIM	Somalia Water and Land Information Management
TEC	Telesom Electricity Company
TOR	Terms of Reference
UNEP	United Nations Environment Programme
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNDP	United Nations Development Programme
USGS	United States Geological Survey
USD	United States Dollar
WB	World Bank
OPGW	Optical Ground Wire
TA	Technical Advisor
CII	Critical Information Infrastructure
CMM	Cybersecurity Maturity Model
G2B	Government-to-Business
G2P	Government-to-People

EXECUTIVE SUMMARY

The Eastern Africa Regional Digital Integration Project (EA-RDIP) in Somaliland aims to expand digital connectivity, strengthen regional integration, and enhance access to digital services through investments in fiber-optic infrastructure, data systems, and institutional capacity building. The project is implemented by the Ministry of Information and Communication Technology (MICT or the Ministry) and supported by the World Bank, in alignment with national development priorities and regional digital integration objectives.

Under the project the ministry intends to demolish and reconstruct an existing single story office building within the Ministry headquarters in Hargeisa (the subproject), the proposed office building will have one floor and is estimated to be approximately 921 square meters (m²). This new infrastructure will accommodate the PIU staff and some ministry staff who are currently utilizing the building as their offices.

This Environmental and Social Management Plan (ESMP) has been developed for the demolition and re-construction of the MICT office, in line with the Project Environmental and Social Management Framework (ESMF). The ESMP outlines the measures necessary to manage potential environmental and social (E&S) risks and impacts during the pre-construction, construction and operation phases of the ministry building, and to ensure compliance with relevant national environmental law/regulations, the Project ESCP and ESMF, the World Bank Environment and Social Framework (ESF) and relevant World Bank Group Environmental, Health, and Safety (EHS) Guidelines.

E&S Benefits: The ESMP identifies several positive E&S impacts resulting from the office construction sub-project. These include the creation of a modern, environmentally friendly building equipped with inclusive facilities for women, persons with disabilities, and other vulnerable groups. The subproject will improve hygiene and sanitation through the provision of adequate WASH facilities, proper drainage systems, and organized waste management, through establishing a proper mechanism for waste handling, dealing with licensed companies for waste transportation and disposing it to the appropriate sites. Additionally, the new building will be equipped with occupational health and safety (OHS) measures such as safe access/egress, site security, fall protection, electrical safety, safety signage, First Aid, etc., introducing PPE, safety training, and awareness programs to the PIU and Ministry staff. The subproject is expected to generate employment opportunities during construction, (according to the estimates made by the ministry and the architecture firm, approximately more than 200 jobs will be created) strengthen institutional capacity, and promote sustainable practices such as energy and water efficiency and greening of the building surroundings, contributing to long-term resilience and improved working conditions.

Anticipated E&S Risks and Impacts: Despite these benefits, the ESMP highlights potential negative risks and impacts that need careful management. Key risks and impacts include dust and air pollution during demolition and construction, noise and vibration affecting nearby offices and prayer spaces, and solid and construction waste generation requiring proper disposal. Other impacts potentially involve soil erosion, vegetation clearance, and greenhouse gas (GHG) emissions, as well as OHS hazards for workers and community safety risks that include traffic incidents and restricted access. Social risks include temporary disruption of MICT services, labor-related grievances, lack of stakeholder engagement and information disclosure and the possibility of gender-based violence (GBV) or harassment if safeguards are not enforced. Relevant safeguards include implementation of the Labor Management Procedures (LMP); a site-specific OHS Plan and emergency preparedness measures; contractor environmental and social requirements under the C-ESMP (including erosion, dust and waste controls); Traffic Management and community health and safety measures; functional grievance redress mechanisms (GRMs) for both workers and community members and a mandatory Workers' Code of Conduct (CoC) for all contractor personnel, reinforced through SEA/SH and GBV prevention training, clear reporting and response procedures, and enforcement through supervision and corrective actions.

E&S Risk Mitigation Measures: To mitigate potential risks, the ESMP outlines specific actions, including waste management strategies, pollution control measures, and protocols for community engagement. The ESMP also emphasizes the importance of implementing adequate health and safety measures for workers, and ensuring that construction activities comply with Social and environmental standards. These impacts are considered moderate and manageable through mitigation measures such as dust suppression, noise barriers, waste segregation, erosion control, strict OHS protocols, training of workers and ongoing stakeholder engagement.

Implementation Arrangements: The ESMP will be implemented by the appointed contractor during the construction phase through developing a C-ESMP, under direct supervision of the PIU ESF team, under the Project implementation Unit (PIU). This multi-level oversight ensures that the relevant World Bank's Environmental and Social Standards (ESSs) are adhered to and that any challenges are promptly addressed.

Stakeholder engagement: Stakeholder consultation is a key component of the subproject, with extensive and inclusive consultations conducted as per the updated Stakeholder Engagement Plan (SEP) for the EA-RDIP project. Relevant stakeholders, including neighboring communities, and the government representatives, were consulted to gather input and ensure that their concerns are considered in the planning and execution of the sub-project. This ESMP provides a comprehensive framework to guide the demolition and construction of the MICT office within the ministry headquarter, ensuring that both environmental protection and social benefits are prioritized and the risks and impacts mitigated throughout the demolition, construction and operation processes.

In conclusion, the ESMP concludes that the proposed office construction sub-project will deliver substantial E&S benefits, including improved infrastructure, enhanced health and safety standards, and inclusive facilities for vulnerable groups. While the sub-project presents moderate risks such as dust, noise, waste generation, and temporary service disruptions, these impacts are predictable and manageable through the mitigation measures outlined in the plan. With strict adherence to World Bank ESSs, robust monitoring, and continuous stakeholder engagement, the sub-project is expected to be implemented in a socially responsible and environmentally sustainable manner. Overall, the ESMP provides a clear roadmap to ensure that the demolition and construction activities achieve their intended objectives while minimizing adverse effects on workers, communities, and the surrounding environment

1. INTRODUCTION

1.1. Project Background Information

The Government of Somaliland continues to face significant structural constraints in its digital development most notably the absence of an integrated national fiber-optic backbone network. This gap has left more than 70 percent of the population without access to reliable broadband services. Broadband adoption remains substantially lower than that of regional peers, with mobile broadband penetration estimated at only 15.4 percent. Persistent weaknesses across the telecommunications value chain adversely affect service quality, resulting in low data speeds, high call-drop rates and inconsistent network reliability. Moreover, market fragmentation and the lack of effective interconnection among operators have constrained network expansion beyond major urban centers. Data management and hosting arrangements remain highly fragmented, while institutional, legal and governance frameworks for data protection and privacy are still limited in both scope and operational effectiveness.

Somaliland's cybersecurity ecosystem is likewise at a nascent stage and requires targeted support for effective operationalization. Diagnostics conducted with World Bank support specifically the Critical Information Infrastructure (CII) and Cybersecurity Maturity Model (CMM) assessments indicate that Somaliland remains in the "start-up" phase of cybersecurity development. While efforts are underway to formulate a national cybersecurity strategy, policy framework and institutional arrangements, these systems are not yet fully established or functional. Plans to introduce a national Computer Emergency Response Team (CERT) and Security Operations Center (SOC) represent a critical step forward; however, sustained technical assistance and institutional capacity-building will be essential to ensure their effectiveness and long-term sustainability.

At the regional level, Somaliland has yet to fully leverage opportunities for digital trade and integration due to limited trade agreements and the absence of key digital-service enablers. Market integration remains constrained by factors such as limited participation in international trade frameworks relevant to the telecommunications sector, the absence of a comprehensive e-commerce strategy and underdeveloped digital regulatory infrastructure. Although an e-Government strategy and a Government Enterprise Architecture (GEA) are currently under development, a shared technical interoperability platform is still required to enable seamless data exchange across government systems. At present, only a limited number of Government-to-Business (G2B) and Government-to-People (G2P) services have been deployed, including visa processing, business registration and selected digital payment services.

There is also significant scope to strengthen the capacity of the Somali Research and Education Network (SomaliREN), particularly to expand connectivity to higher-education institutions and to foster collaboration with more mature National Research and Education Networks (NRENs) in the region. Strategic partnerships with established networks such as those in Kenya and Ethiopia could accelerate knowledge transfer, infrastructure development and service expansion.

Through the East Africa Regional Digital Integration Project (EA-RDIP or the Project), the Government of Somaliland will benefit from an allocation of USD 13.5 million to support a series of strategic investments aimed at enhancing regional connectivity, strengthening participation in the regional data market, and enabling integration into the regional online and digital services ecosystem.

1.1.1. Project Development Objectives and Components

The Series of Projects (SOP) Development Objective is to promote the establishment of an integrated digital market across the Eastern Africa region by facilitating increased cross-border flows of broadband infrastructure, data traffic and digital services. This objective seeks to reduce fragmentation across national markets, enhance regional connectivity and enable seamless digital interactions among participating countries.

The Project Development Objective (PDO) of SOP-I is to advance regional digital market integration by expanding access to affordable and reliable broadband connectivity and by strengthening the enabling environment for digital service delivery. This includes improving digital infrastructure, enhancing regulatory and institutional frameworks and supporting the systems and capacities necessary to deliver inclusive, secure and interoperable digital services at both national and regional levels.

1.1.2. EARDIP Components

Table 1: EA-RDIP Project components

Project components	Sub-components	Aim/focus
---------------------------	-----------------------	------------------

<i>1.1.3. Component 1: Connectivity market development and integration</i>	Sub-component 1.1: Cross-border and backbone network connectivity	The sub-component aims to support the deployment of up to 1287 km of new fiber along prioritized routes including connecting main cable landing station in Berbera and connecting it to cross-border links to Somalia, Kenya, Ethiopia. The fiber is likely to be deployed in phases, starting in the north, based on a more permissible security context. A feasibility study will inform the design of fiber layout (underground, aerial, or via Optical Ground Wire (OPGW) along the power grid for the prioritized routes.
	Sub-component 1.2: Last mile connectivity including in borderland areas	To connect remote, rural, borderland locations where the commercial incentive for last-mile network expansion is insufficient. Financing will be provided towards connecting population centers, public institutions along the fiber route and establishing low-cost portable, emergency response options of Wi-Fi hotspots, nomadic Radio Access Network (RAN) network transceivers in host communities and Internally Displaced Persons (IDP)/refugees camps in borderland areas.
	Sub-component 1.3: Enabling legal, regulatory and institutional ICT environment	Technical assistance (TA) will be provided to strengthen the institutional capacity of MICT to effectively spearhead the connectivity agenda and

		universal services targets through the development of new policy and regulatory instruments.
<i>1.1.4. Component 2: Data market development and integration</i>	Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity:	Support will build-on cybersecurity activities previously supported under Somalia Capacity Advancement, Livelihoods and Entrepreneurship, through Digital Uplift Project SCALED-UP (P168115) and will continue to strengthen the cybersecurity framework and build capacity for responding to cyber threats/cybercrimes and create greater awareness on cyber security.
	Sub-component 2.2: Data exchange, governance and protection	To improve the efficiency of data storage, transmission, and build resilience for government data storage. Financing support for data backups through public cloud subscriptions enabling disaster risk management. Technical assistance would be provided on policies and institutional governance for data protection policies, including operationalizing the new Data Protection Authority (DPA).

<i>1.1.5. Component 3: E-service development and market integration</i>	Sub-component 3.1: Digital cross-border trade, payment and service enablers	To support the creation of Somaliland's Digital Public Infrastructure, including enabling Digital Government frameworks, with an aim to expand adoption of e-services and foster the cross-border interoperability of such systems and solutions.
	Sub-component 3.2: Regional research and education networks (RENs), and training for digital skills	To strengthen the higher educational network through the REN and integration with regional RENs allowing for network economies and knowledge transfer. Relatedly, leveraging enhanced capacity of universities through RENs and in partnership with the government, digital learning programs would be conducted for civil servants and university students.

<i>1.1.6. Component 4: Project Management and Implementation Support</i>		This component would finance the establishment and operations of the PIU's at MICT for project implementation. Implementation would entail functions of project management and coordination, including procurement, financial management (FM), and M&E, as well as environmental, social and GBV safeguards management. Specifically, this component would consist of (a) operating and staff costs of the PIU, including the recruitment of expert consultants in key areas and training; (b) development and maintenance of a dedicated website for the project; (c) support for stakeholder consultations and M&E, including collecting gender disaggregated data; and (d) coordination with the regional PIU at IGAD level.
---	--	---

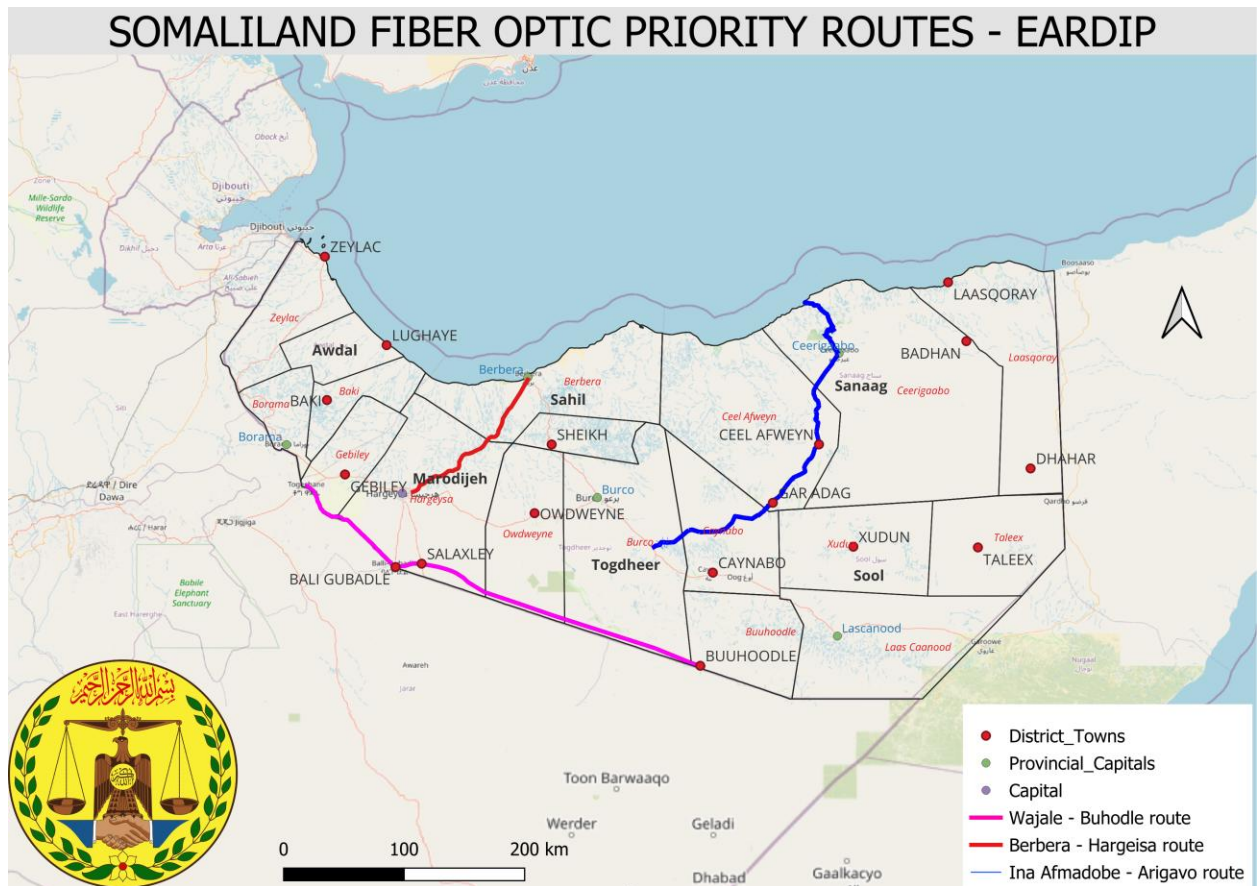


Figure 1: Priority fiber optic links proposed in Somaliland.

1.1.7. Purpose of the ESMP

This office construction activity is intended to provide a dedicated workspace for the Ministry of Information and Communication Technology (MICT) EARDIP Project Implementation Unit (PIU) in Somaliland. The sub-project site is located within the existing MICT compound and is currently occupied by the Human Resources (HR) and Postal Services departments. The proposed intervention involves the demolition and construction of a new office building within the same block with appropriate arrangements for the temporary relocation of the affected departments during the construction period.

The primary objective of this Environmental and Social Management Plan (ESMP) is to identify, assess and manage the potential environmental and social risks and impacts associated with the pre-construction, construction and operation activities and to establish site-specific mitigation and management measures. The ESMP serves as a practical tool to ensure that identified risks are effectively avoided, minimized, mitigated, or otherwise managed throughout the project's lifecycle.

This ESMP systematically outlines the anticipated adverse environmental and social (E&S) risks and impacts that may affect surrounding communities, neighboring institutions, workers and site users and proposes corresponding mitigation measures for each identified impact. The assessment has been conducted in full compliance with the World Bank Environmental and Social Framework (ESF), including relevant Environmental and Social Standards (ESSs), the WBG EHS Guidelines, as well as applicable national laws, regulations and guidelines.

Specific objectives of this ESMP

- Identify and assess the key E&S risks and impacts associated with the proposed sub-project activities across all phases of implementation.
- Develop appropriate mitigation, management and enhancement measures to address the identified risks and maximize positive environmental and social outcomes.
- Inform, validate and support the finalization of the sub-project design by integrating E&S considerations into technical planning and decision-making processes.
- Serve as a practical framework to guide E&S monitoring, supervision, reporting and corrective actions throughout the sub-project lifecycle.
- Ensure meaningful engagement and inclusion of relevant stakeholders including affected communities and institutions in accordance with principles of transparency, inclusiveness and continuous consultation.
- Strengthen environmental and social risk management across all sub-project activities by establishing clear institutional roles and responsibilities, enhancing the capacity of implementing entities, contractors, workers and local communities through targeted training, and ensuring that all interventions are executed in a socially responsible, environmentally sustainable and resilient manner.
- Ensure development of C-ESMP to manage the identified risks and impacts.

1.1.8. Methodology

The ESMP has been prepared by the Environmental, Gender-Based Violence (GBV) and Social Specialists of the EA-RDIP project using the following methodologies:

- Reviewing the preliminary designs for the proposed subproject to screen E&S issues in the vicinity;
- Referencing the initial Environmental and Social screening report conducted earlier.
- Visiting the subproject site, and consulting with relevant key stakeholders, including the government, local communities and business owners near the site.
- Carrying out a site assessment ensuring that all key E&S concerns and views of all Parties/persons likely to be affected by the subproject are taken into consideration; and
- Developing E&S mitigation measures with mechanisms for monitoring and evaluating the ESS compliance and environmental and social performance.

2. SUB-PROJECT DESCRIPTION

2.1. Sub-project Activities

The sub project entails the deconstruction of an existing single-store office block within the Ministry of Information and Communication Technology (MICT) compound and the construction of a new Sub-project Implementation Unit (PIU) office on the same footprint. The new facility will include offices for PIU and MICT staff, a meeting hall, separate washrooms for men and women, a women's prayer room and landscaping of the surrounding area to improve the site's functionality. The new building will be fully accessible and disability-inclusive, designed to accommodate individuals of all abilities through features such as ramps, automatic doors, accessible restrooms, clear signage and well-lit pathways. Collectively, these facilities are intended to support a safe, inclusive and efficient working environment that aligns with the operational requirements of the sub-project and the institutional needs of MICT.

The sub-project site is located within the compound of the Ministry of Information and Communication Technology (MICT) and covers an area of approximately 921 square meters. The proposed building design has been developed in accordance with the available site footprint and includes an expansion of the original space currently occupied, allowing for improved spatial efficiency and service provision. In line with the draft architectural design, the new structure will comprise a ground floor intended to serve as a central hub for Project implementation activities. This will enable the PIU to effectively coordinate, supervise, and manage project operations, while also facilitating close collaboration with MICT as the lead government agency for the project.

During the sub-project implementation phase a range of activities are anticipated to be undertaken including the following:

2.1.1. Pre-construction Phase

Prior to any deconstruction works a pre-deconstruction hazardous materials survey (to identify potential asbestos-containing materials or lead based paint) will be conducted. If such materials are found, works will proceed in accordance with an approved Method Statement using licensed handlers and approved disposal routes consistent with national regulations and World Bank EHS standards.

- *Structural Assessment and Design Development*

On August 2025, MICT commissioned a qualified consultancy firm to undertake a comprehensive structural assessment of the existing building to determine its condition, safety and suitability for continued use. The assessment concluded that the structure is no longer fit for rehabilitation, owing to its advanced age dating back to the colonial era. As such the building has experienced substantial deterioration leading to a significant loss of structural integrity and load-bearing capacity. As a result, the structure presents potential safety risks to MICT staff and other occupants operating within the premises.

In light of these findings MICT proceeded to engage a separate consultancy firm to develop a new building design within the same block. The proposed design incorporates a range of functional spaces including

office areas a meeting hall a mosque sanitary facilities and other essential support areas. Consistent with the recommendations of the Environmental and Social Assessment the design adopts environmentally and socially sustainable principles and integrates gender-responsive and disability-inclusive features. The design process has prioritized the avoidance, minimization and mitigation of potential adverse environmental and social impacts, ensuring compliance with relevant national regulations and the World Bank ESF.

- *Stakeholder engagement*

In accordance with World Bank procedures, stakeholders play a pivotal role in the planning and implementation of development sub-projects, particularly where sub-project activities may generate both positive and adverse impacts on communities either directly or indirectly. Meaningful stakeholder engagement is therefore essential to ensuring that sub-project design and implementation are inclusive, transparent, and responsive to stakeholder concerns.

Throughout the design development process and the preparation of the ESMP, the PIU ESF team undertook two consultation meetings on 10th and 11st November, 2025 with the identified relevant stakeholders that includes neighboring stakeholders such as Ministry of Health, Silanyo Public Library, Telesom Electric Company, Mosque, and others. These engagements provided opportunities to disclose sub-project information, discuss anticipated impact and solicit stakeholder views, concerns and recommendations. Stakeholder feedback was carefully reviewed and integrated into sub-project planning and the responses to issues raised are reflected in the final sub-project design and associated E&S mitigation measures.

- *Environmental and social Assessments*

From October to November 2025, The PIU ESF undertook a two-stage assessment process to identify, assess and manage the potential environmental and social risks and impacts associated with the sub-project.

In the first stage, the team conducted environmental and social screening using a standardized screening checklist (attached as Annex 1) to systematically evaluate potential risks and impacts. The findings of this screening indicated medium risk rating, documented through the pre-feasibility assessment, indicated the need for more detailed analysis and mitigation planning. Accordingly, the preparation of a comprehensive ESMP was recommended.

In the second stage, the ESF team prepared a detailed and site-specific ESMP as presented in this report. This ESMP provides a structured framework for managing identified risks and impacts identified during the screening stage through defined mitigation measures, monitoring arrangements and institutional responsibilities throughout the sub-project lifecycle.

- *Capacity building*

Capacity building is a critical pre-construction activity to ensure the effective and consistent implementation of E&S management measures throughout the sub-project lifecycle. This will be

after contract award and prior the commencement of construction activities and it includes the delivery of orientation sessions for PIU staff, contractors and relevant site personnel on the requirements of the World Bank ESF the implementation of the ESMP, occupational health and safety (OHS) standards, waste and materials management, stakeholder engagement processes and the operation of grievance redress mechanisms.

Strengthening institutional and technical capacity at this early stage will enhance regulatory compliance, improve risk identification and mitigation and support proactive environmental and social performance management during sub-project implementation. This approach will contribute to safer working conditions, reduced environmental impacts, improved community relations and overall sub-project effectiveness during the construction phase and beyond.

2.1.2. Construction Phase

Construction is anticipated to last approximately six (6) to eight (8) months and will engage more than 200 workers (including skilled, semi-skilled and unskilled labor) with workforce levels expected to vary by phase. Activities will commence with the controlled demolition and excavation of the existing structure, followed by the systematic collection, segregation and transport of debris to designated and approved disposal sites in accordance with applicable environmental regulations. Upon completion of site clearance, excavation and ground preparation works will be undertaken to ready the site for the proposed construction activities.

The construction phase will involve the installation of new foundations, the erection of structural columns and the construction of reinforced concrete roofing systems in line with approved engineering designs and safety standards. Following the completion of structural works, furnishing and finishing activities will be carried out including the installation of internal fittings, electrical and mechanical utilities and other essential building services.

Construction activities will also include vegetation clearance and the establishment of temporary laydown areas equipped with covered skips for segregated waste storage. Temporary water reservoirs may be placed on-site for construction use utilizing existing water and power connections within the compound. No off-site borrow pits, quarrying or new access roads are anticipated as all construction inputs and access will be managed within the existing MICT compound. The debris generated from the deconstruction of the old building will be collected, segregated and lawfully disposed of in designated municipal facilities. The construction phase will conclude with landscaping and site restoration activities aimed at improving site aesthetics, managing surface runoff, reducing erosion and enhancing the overall environmental quality of the sub-project area. Once completed, the planned EARDIP office will serve as a central hub for project implementation, coordination and oversight enabling the PIU to effectively manage project activities and support the MICT in delivering project objectives. Table 2 presents the sub-project location while Figure 2 shows the Ministry compound, the red polygon is the proposed site for office construction

Table 2: sub-project site location

<i>Site Name</i>	<i>Latitude</i>	<i>Longitude</i>
<i>MICT premises</i>	<i>9°33'37.24"N</i>	<i>44° 3'25.53"E</i>



Figure 2: shows the site location.

Policy, Legislative and Institutional frameworks

2.2. Somaliland National legislation, policies and Laws

2.2.1. National Environmental regulations, policies and procedures

- The Constitution of the Republic of Somaliland (2001) forms the foundation of environmental and land governance. Article 12 establishes that land is a public asset owned by the nation and managed by the state, with the government responsible for exploration and exploitation of natural resources on both land and sea. While Article 18 emphasizes environmental protection and disaster response, including famine, epidemics, storms, and earthquakes.
- The Somaliland Environmental Management Act (2014): Building on constitutional provisions, the Somaliland Environmental Management Act (2014) operationalizes Articles 12(4) and 18(1) by requiring Environmental Impact Assessments (EIA) for projects likely to affect land, water, agriculture, industry, transport, or energy. This legislation provides the first

systematic mechanism for integrating environmental considerations into development planning.

Relevance:

The constitution represents the basis of the environmental and social issues, where it is clearly states in various articles addresses to protect the environment and make response to the disaster.

The Somaliland Environmental Management Act (2014) directly is relevant to this activity, where it requires to conduct environmental impact assessment for sub-projects similar to this nature, so this activity will comply the national environmental requirements by conducting ESMP and the initial environmental screening.

Compliance:

Construction and demolition activities will generate solid and potentially hazardous waste, making this law directly applicable. The sub-project will comply by implementing proper waste segregation, safe transportation and disposal at approved dumping sites, coordination with licensed waste service providers, and adherence to municipal waste management procedures.

- Somaliland, Urban Waste Management and Sanitation Laws No 83 of 2018: This law applies to the solid, liquid, and sanitary waste management in the cities of the Republic of Somaliland and consisting of 64 articles, mainly aims to
 - have clean cities that are safe for public health, and improve their beauty, hygiene, and sanitation;
 - promote all the social services related to environmental sanitation to strengthen and enhance the availability of a clean environment in which to live;
 - have a law to strengthen the capacity of the Urban Sanitation and Waste Management;
 - enable the development of the National Plan for Solid Waste, Liquid, and Sanitation and translate it into national plans;
 - establish a collaborative framework for collaboration between all stakeholders in the development of waste management and sanitation;
 - encourage the Public-Private Partnership (PPP) system in the sector. The services related to hygiene and sanitation are the responsibility of the local Governments whose duties are detailed in article 5.

While the role of the Ministry of Health, mainly support, training, and guidance, is dealt with in article 6. Other concerned ministries, whose tasks are indicated in the following articles, are the Ministry of Environment and Rural Development, the Ministry of Water Resources Development, the Ministry of Trade, Industry and Tourism, and the Ministry of Livestock and Fisheries Development. The Law deals with the companies responsible for the services related to waste management and with (i) waste companies (art.11); (ii) slaughterhouse companies (art.12); (iii) waste development and recycling companies (art.13). As for the sub-sectors, the Law considers the following (i) household waste (art.17); (ii) commercial waste (art.18); (iii) industrial waste (art.19); (iv) hazardous waste produced by health facilities (art.20); (v) waste produced in public

areas, such as road, schools, markets, fishery-related fields, building. Waste management includes storage and separation, collection, and disposal which are the objects of articles 28-31. Regarding the garbage dumps, article 33 establishes that they have to be placed where the local government and the relevant government agencies have checked to see that it is appropriate. The waste management business is organized through a license and contracts system (art. 34) and with the payment of fees, as provided in article 35.

Relevance and Compliance:

Since the sub-project is located within an urban setting, coordination with the relevant district authority will be ensured regarding waste disposal and sanitation management. Compliance will be achieved through alignment with local waste management plans and cooperation with municipal authorities for monitoring and site inspections'

- Somaliland Regional and District Administration Law (Law/No23/2002): article (36), local governments are responsible for providing social services including hygiene and sanitation. The main provisions are the following:
- The local government will develop a comprehensive plan for the implementation of waste and sanitation management strategies.
- Household solid waste will be collected once or twice weekly, while collection from other areas such as business centers, healthcare facilities, schools, and public spaces will occur one to two times daily.
- Efforts will be made to encourage the adoption of reuse and recycling technologies for solid waste, aiming to reduce unemployment.
- Service providers will operate as public-private partnership companies, selected and contracted through a transparent process. Contracts will clearly define the roles and responsibilities of each party and ensure a clean and hygienic environment. Local governments will oversee the preparation and monitoring of waste disposal and dumping sites.
- Regular monitoring will be conducted for waste collection, segregation, transportation, and disposal processes.
- Research projects focusing on recycling and reusing waste will be actively promoted. There are no specific laws and regulation on e- wastes, however Somaliland has enacted Somaliland Waste Management and Sanitation Act Law No. 83/2018 and signed both Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (1989) and the 1991 Bamako Convention on the Ban of Import into Africa and Control of Transboundary Movement and Management of Hazardous Wastes within Africa.
The Draft Land Tenure Policy promotes equitable access to land, strengthens tenure security, safeguards pastoralist rights, and ensures participation and compensation in land-related decisions.
- Draft Land Tenure Policy: A draft Land Tenure Policy seeks to secure equitable access to land, safeguard pastoralists' rights, strengthen tenure security across social groups, and ensure compensation and participation in land-related decision-making. Resource Roles and Responsibilities of Workforce on site. Land tenure remains a critical challenge. Somaliland

lacks a comprehensive written law on land acquisition, with governance often falling under Xeer, the traditional customary law.

- The National Environmental Policy provides the framework for sustainable environmental governance, promoting EIA processes, biodiversity conservation, environmental audits, community participation, and integration of cross-cutting issues such as climate change and gender.
- National Environmental Policy (2015): The Ministry of Environment and Climate Change (MoECC) is the lead authority for environmental management. Its work is guided by the National Environmental Policy (2015), which provides a framework for sustainable environmental governance. The policy emphasizes the right to a healthy environment, harmonization of sectoral laws, and active participation of communities and the private sector. It also promotes EIA, environmental audits, biodiversity conservation, environmental education, and cross-cutting interventions in land tenure, climate change, gender, youth inclusion, and human settlements.

2.2.2. National Social and GBV regulations, policies and procedures

The Constitution of the Republic of Somaliland (2001) – Social Provisions

The Constitution guarantees social welfare, protection of vulnerable groups, labor rights, and safe working conditions under Articles 18, 19, and 20.

Relevance and Compliance:

The sub-project will comply by ensuring safe and fair working conditions, protection of vulnerable groups, non-discrimination in employment, and implementation of community health and safety measures during construction.

Somaliland has developed a range of social policies, legal instruments and institutional mechanisms that guide social welfare, labor rights, gender equality, community protection, and inclusive development. These frameworks inform how government institutions, development partners, contractors and service providers manage social risks, safeguard vulnerable groups, and ensure equitable access to project benefits.

Constitutional Provisions Supporting Social Protection and Inclusion:

- The Constitution of the Republic of Somaliland (2001) establishes the overarching social governance framework. Several articles directly shape social risk management:
- Article 18 protects personal rights and emphasizes state responsibility in responding to disasters, epidemics, and public emergencies.
- Article 19 highlights social welfare obligations, mandating support for vulnerable groups including people with disabilities, orphans, and marginalized communities.
- Article 20 guarantees the right and duty to work under safe and fair conditions, forming the foundation of labor protections and workplace safety standards.

Labor Regulations and Workforce Protection

- The Labor Code of Somaliland (2004), commonly referenced in practice, establishes key social protections that are particularly relevant to construction and public-sector projects. Despite variations in implementation, the Code prohibits forced and child labor, promotes equal opportunity and non-discrimination in employment, and requires the provision of safe and healthy working conditions. It also mandates the use of written employment contracts, fair wage practices, and provides workers with entitlements to leave, compensation, and adequate rest periods.

The Labor Code establishes provisions for safe working conditions, prohibition of child and forced labor, non-discrimination, written contracts, fair wages, and worker entitlements.

Relevance and Compliance:

The contractor will comply with the Labor Code by providing written contracts, ensuring occupational health and safety (OHS) standards, prohibiting child and forced labor, maintaining workers' records, and establishing a workers' grievance redress mechanism (GRM).

Social Protection and Vulnerable Groups

- The National Social Protection Policy (2019), led by the Ministry of Labour and Social Affairs (MOLSAF), establishes a national framework for protecting vulnerable populations in Somaliland. The policy focuses on the provision of cash transfers and social assistance, strengthening community-based welfare structures, promoting disability-inclusive programming, and enhancing child protection and family welfare mechanisms to reduce vulnerability and social exclusion.

This policy strengthens social assistance systems and promotes disability inclusion, child protection, and welfare support mechanisms.

Relevance and Compliance:

The sub-project will align with this policy by promoting inclusive employment opportunities, ensuring accessibility where feasible, and protecting vulnerable groups from adverse project impacts

Gender and GBV/SEAH-Related Frameworks

- The National Gender Policy (2021), led by the Ministry of Labour and Social Affairs (MoLSAF), outlines the Government of Somaliland's commitment to promoting gender equality and advancing women's rights across all sectors. The policy prioritizes enhancing women's economic and political participation, preventing gender-based violence and strengthening survivor support services, promoting gender-responsive institutions and policies, and mainstreaming gender considerations into national development planning. In practice, Somaliland applies relevant international standards through MoLSAF and development partners by enforcing Codes of Conduct for all project workers, establishing mandatory GBV/SEAH reporting pathways, ensuring survivor-centered response mechanisms, and strengthening community awareness, grievance mechanisms, and community health, safety, and public welfare systems.

The policy promotes gender equality, prevention of Gender-Based Violence (GBV), and gender mainstreaming across sectors.

Relevance and Compliance:

The sub-project will comply by enforcing a Code of Conduct for all workers, establishing GBV/SEAH reporting mechanisms, conducting awareness training, and ensuring survivor-centered grievance handling systems

Public Health Regulations (Ministry of Health Development)

- These regulations govern communicable disease control, occupational health standards, sanitation requirements in workplaces and public spaces, and health inspection procedures. They also guide the implementation of construction-site health measures, including worker medical screening, provision of first aid services, emergency preparedness, and the establishment of adequate sanitation and hygiene facilities.

Youth and Social Inclusion Policies

The Somaliland National Youth Policy (2017–2021, with ongoing updates) promotes youth empowerment through employment creation and skills development, enhanced youth participation in governance and decision-making processes, and the provision of safe and inclusive public spaces. The policy also supports stronger institutional coordination and social governance mechanisms to ensure that youth-related interventions are effectively integrated across sectors.

This policy promotes youth employment, skills development, and inclusive participation in governance.

Relevance and Compliance:

The sub-project will contribute to youth empowerment by promoting fair recruitment practices, providing employment opportunities during construction, and encouraging skills development where feasible

National Development Plan (NDP-3, 2022–2027)

- Somaliland National Development Plan III (NDP-3) integrates social development objectives across key thematic areas, including human capital development, gender equality, improved social services delivery, and the promotion of good governance and accountability to support inclusive and sustainable national development.

NDP-3 integrates social development, governance, gender equality, and sustainable economic growth objectives.

Relevance and Compliance:

The sub-project aligns with NDP-3 by supporting institutional strengthening, improving government infrastructure, ensuring environmental sustainability, and promoting inclusive development practices consistent with national priorities

2.3. World Bank Environmental and Social standards and guidelines

The sub-project has been screened in accordance with the World Bank Environmental and Social Framework (ESF) to determine the applicable Environmental and Social Standards (ESS). Given the nature and scale of the proposed works—limited to the demolition of an existing structure and construction of a single-storey MICT office within an existing government compound—only ESS 1, ESS 2, ESS 3, ESS 4, ESS 8, and ESS 10 are applicable. These standards adequately address the anticipated environmental, occupational health and safety, labor, community safety, cultural heritage, and stakeholder engagement risks associated with the sub-project.

- **ESS1 – Assessment and Management of Environmental and Social Risks and Impacts:** This standard is fundamental for all project activities, requiring, where necessary, Environmental and Social Management Plans (ESMPs) to manage potential risks. For the demolition and reconstruction of the PIU/MICT office, ESS1 necessitates an ESMP specifically addressing issues like dust, waste management, and community health and safety during demolition and construction.

The sub-project has been screened in accordance with the World Bank ESF and ESS1 is applicable as the sub-project involves civil works that may generate environmental and social risks, including dust emissions, construction waste, occupational hazards, and temporary disturbances to nearby institutions. The preparation and implementation of an Environmental and Social Management Plan (ESMP) ensures that these risks are properly identified, assessed, mitigated, monitored, and reported throughout the project lifecycle.

- **ESS2 – Labor and Working Conditions:** This standard ensures safe and fair labor practices, including working conditions, worker health and safety, and a separate grievance redress mechanism (GRM) for workers. The demolition and construction work of the MICT building requires strict adherence to ESS2 to protect workers from hazards like heavy equipment use and potential exposure to dust or other harmful substances. ESS2 is relevant because the sub-project will engage direct and contracted workers during demolition and construction phases. Risks include occupational injuries, exposure to dust and noise, use of heavy machinery, and potential labor-related grievances. Compliance with ESS2 ensures safe working conditions, fair labor practices, prohibition of child and forced labor, implementation of occupational health and safety (OHS) measures, and establishment of a workers' Grievance Redress Mechanism (GRM).
- **ESS3 – Resource Efficiency and Pollution Prevention and Management:** ESS3 is relevant to managing pollution and ensuring resource efficiency. For the Ministry site, it applies to managing dust, noise, and waste during demolition and construction, ensuring minimal environmental impact, and applying best practices in resource usage during reconstruction. ESS3 applies due to potential pollution and resource use during demolition and construction activities. These include generation of solid waste, possible hazardous materials, dust emissions, noise, and inefficient use of water and construction materials. The standard ensures the adoption of pollution prevention measures, proper waste management, efficient use of resources, and environmentally sound disposal practices

- **ESS4 – Community Health and Safety:** Focused on protecting the health and safety of nearby communities, ESS4 is critical for the PIU office sub-project to mitigate potential risks from dust, debris, noise, hazardous material exposure, traffic accidents, and potential issues due to labor influx, including sexual exploitation, abuse, and harassment (SEAH). Measures include fencing, safety signage, controlled traffic access and safety measures, prevention of SEAH through awareness raising among the workers and use of workers' code of conduct, and respective communication with residents about safety precautions.
ESS4 is relevant because construction activities may pose temporary risks to surrounding government institutions and compound users. Potential impacts include dust, noise, debris, traffic-related accidents, and community exposure to construction hazards. Additionally, labor influx may create social risks such as Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH). The standard ensures implementation of measures such as site fencing, safety signage, controlled access, traffic management, workers' Code of Conduct, and community awareness and grievance mechanisms
- **ESS8 – Cultural Heritage:** ESS8 seeks to protect tangible and intangible cultural heritage. ESS8 may be relevant to this sub-project if there is a chance found during excavation works.
Although the sub-project is located within an existing government compound, ESS8 is applicable as a precautionary measure in case any physical cultural resources are encountered during excavation works. A Chance Find Procedure will be included in the ESMP to ensure proper management of any unexpected archaeological or cultural heritage findings
- **ESS10 – Stakeholder Engagement and Information Disclosure:** ESS10 emphasizes the need for ongoing community engagement and information dissemination. For the PIU sub-project, this involves informing stakeholders about construction timelines, risks and potential negative impacts, and benefits, and establishing a grievance mechanism to address concerns.
ESS10 is applicable because the sub-project affects stakeholders within and around the MICT compound. Effective stakeholder engagement is necessary to inform affected parties about project activities, timelines, potential risks, and mitigation measures. The establishment of a project-level Grievance Redress Mechanism (GRM) ensures transparency, accountability, and timely resolution of concerns

The remaining Environmental and Social Standards are not applicable to the MICT office construction sub-project. ESS5 is not triggered as no land acquisition, resettlement, or restrictions on land use are involved; all activities will be undertaken within the existing MICT compound on government-owned land. ESS6 does not apply because the site is located in a previously developed urban area with no natural or critical habitats. ESS7 is not relevant as no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are present in the sub-project area. ESS9 is not applicable as the sub-project does not involve financial intermediary activities.

2.4. Applicable World Bank Group Environmental, Health and Safety (EHS) Guidelines

The MICT office construction sub-project will be implemented in compliance with the relevant World Bank Group Environmental, Health and Safety (EHS) Guidelines. Specifically, the General EHS Guidelines (covering environmental management, occupational health and safety, community health and safety, and construction and decommissioning practices) will apply to all construction activities. In addition, the EHS Guidelines for Construction Materials Extraction will be applied, as relevant, to manage risks associated with sourcing of construction materials. These guidelines will be incorporated into the contractor's Environmental and Social Management Plan (ESMP) and enforced through contractual obligations and supervision arrangements.

2.4.1. General EHS Guidelines

The General EHS Guidelines will apply to all phases of the sub-project, including demolition, site preparation, construction, and demobilization. The key areas of relevance include:

a) Environmental Management

- Air Emissions and Ambient Air Quality: Control of dust and particulate matter during demolition and earthworks through water spraying, covering of stockpiles, and vehicle speed control.
- Noise Management: Implementation of time restrictions for noisy activities, maintenance of equipment to reduce excessive noise, and communication with nearby institutions.
- Waste Management: Segregation of construction and demolition waste, safe storage of hazardous materials (if encountered), and disposal at approved municipal sites.
- Water Quality Management: Prevention of runoff contamination and proper drainage to avoid pollution of surrounding areas.

b) Occupational Health and Safety (OHS)

- Provision and mandatory use of Personal Protective Equipment (PPE).
- Safe operation of heavy machinery and equipment.
- Fall prevention measures for elevated works.
- Hazard communication and worker training.
- Emergency preparedness and response planning, including first aid, fire prevention, and evacuation procedures.
- Incident and accident reporting mechanisms.

c) Community Health and Safety

- Site fencing and restricted access to prevent unauthorized entry.
- Traffic management plans to reduce accident risks within the compound.
- Clear signage and communication with surrounding institutions.
- Measures to prevent labor-related risks, including enforcement of Codes of Conduct addressing GBV/SEA/SH.

d) Construction and Decommissioning Practices

- Safe demolition procedures to manage debris and structural instability risks.
- Proper handling of construction materials.
- Restoration and site clean-up following completion of works.

2. EHS Guidelines for Construction Materials Extraction

Although the sub-project itself does not involve direct extraction activities, the EHS Guidelines for Construction Materials Extraction are relevant where contractors source materials such as sand, gravel, or aggregates from third-party suppliers. These guidelines address:

- Environmental impacts of quarrying and borrow pits, including land degradation and erosion.
- Dust and noise control during extraction and transportation.
- Worker health and safety at extraction sites.
- Rehabilitation of extraction sites after use.
- Compliance with licensing and regulatory requirements.

The contractor will be required to source materials only from licensed and environmentally compliant suppliers and provide evidence of adherence to these standards.

2.5. Good International Industry Practices (GIIP)

In addition to compliance with national regulations and the World Bank ESF, the MICT office Construction Sub-project draws on internationally recognized global best practices applicable to office and institutional building construction that are listed below. These practices provide practical guidance on occupational health and safety, environmental management, waste and resource efficiency, social inclusion, accessibility and ethical labor practices. Integrating these standards strengthens risk management, promotes safe and inclusive working environments and supports sustainable and responsible sub-project implementation.

Occupational Health and Safety

- ISO 45001 – Occupational Health and Safety Management Systems Establishes systematic approaches to hazard identification, risk control, incident reporting and worker protection.
- ILO Conventions and Guidelines on Occupational Safety and Health Promote safe working conditions, prevention of accidents, prohibition of child and forced labor, and workers' rights.

Environmental Management and Pollution Control

- ISO 14001 – Environmental Management Systems Provides a structured framework for managing environmental risks, compliance, monitoring and corrective actions during construction.

- UN Environment Programme (UNEP) Sustainable Construction Guidelines Promote pollution prevention, waste minimization, efficient resource use and environmentally responsible construction practices.
- Construction Waste and Resource Efficiency
- EU Construction and Demolition Waste Management Protocol Recognized global reference for waste segregation, recycling, reuse and documentation of construction waste streams.
- Waste Hierarchy Principle (Prevention–Reduce–Reuse–Recycle–Recover–Dispose) Widely adopted an international approach to minimize environmental impacts of construction waste.
- Health, Safety and Emergency Preparedness
- NFPA (National Fire Protection Association) Standards Internationally applied guidance on fire safety, emergency exits, fire extinguishers and evacuation planning in buildings.
- International Building Code (IBC) Sets standards for structural safety, fire protection, accessibility and safe building design..

Gender, Social Inclusion and Worker Conduct

- UN Guidelines on Gender Equality and Women’s Empowerment Promote gender-responsive workplaces, equal employment opportunities and prevention of harassment and discrimination.
- OECD Due Diligence Guidance for Responsible Business Conduct Encourages transparency, grievance mechanisms, worker protection and ethical contractor behavior.

Disability Inclusion and Accessibility

- UN Convention on the Rights of Persons with Disabilities (CRPD) Supports universal design, barrier-free access and inclusive infrastructure in public buildings.
- Universal Design Principles
Promote accessibility through ramps, accessible toilets, signage, lighting and safe pathways for all users.

Cultural Heritage Precaution

- UNESCO Guidance on Chance Finds
International best practice for managing accidental discovery of cultural or historical materials during excavation.

Stakeholder Engagement and Transparency

- AA1000 Stakeholder Engagement Standard
- Provides principles for inclusive, responsive and transparent engagement and grievance handling.

Climate-Responsive Construction

- Green Building Council Guidelines (e.g., passive cooling, daylighting, energy efficiency)

- Promote climate-appropriate design, reduced energy demand and sustainable operation of office buildings.

3. BASELINE INFORMATION

3.1. Physical Environment

- *Topography*

The topography of Hargeisa is characterized by a highland plateau typical of the northwestern region, with elevations generally ranging between 1,300 and 1,450 meters above sea level. The landscape comprises gently undulating plains interspersed with low hills and shallow valleys that influence natural drainage patterns across the city. These landforms are largely shaped by underlying geological formations of limestone, sandstone and alluvial deposits resulting in a combination of shallow, stony soils on elevated ridges and deeper sandy-loam soils within valley bottoms. This topographic configuration plays a critical role in determining land-use suitability, vegetation distribution and surface water flow within and around the sub-project area.

Hargeisa is intersected by several ephemeral drainage channels, including the seasonal Tog Hargeisa, which convey water only during periods of intense rainfall. Owing to the city's sloping terrain, limited vegetation cover and the presence of highly erodible soils, Hargeisa is susceptible to flash flooding during the Gu and Deyr rainy seasons, particularly in low-lying areas adjacent to dry riverbeds. A clear understanding of these topographic characteristics is therefore essential for effective sub-project planning, surface runoff management and the design of appropriate mitigation measures to minimize environmental, safety and flood-related risks during sub-project implementation.

The sub-project site itself is generally flat and does not contain valleys, streams or drainage channels traversing the area. The surface is predominantly covered by loose topsoil which may be susceptible to erosion if left unmanaged during construction activities. Appropriate soil stabilization and runoff control measures will therefore be incorporated into sub-project design and implementation to prevent soil loss and maintain site stability.

Land Use

Land use in Hargeisa is predominantly urban and semi-urban reflecting the city's role as the political, administrative and economic center of Somaliland. The central districts are characterized by dense residential neighborhoods, commercial areas government offices and small-scale industrial activities. Surrounding these core urban zones are mixed-use areas comprising both formal and informal housing developments which have expanded rapidly in response to population growth and rural-to-urban migration. Public facilities such as schools, health centers, markets and major transport corridors are widely distributed throughout the city, forming the dominant built-up environment within and around the sub-project area.

Beyond the urban core land use gradually transitions into peri-urban and rangeland areas characterized by open spaces, scattered settlements and communal grazing lands. These areas support key livelihood activities including livestock production, small-scale agriculture and

quarrying. Seasonal riverbeds (togs) and their surrounding buffer zones remain largely undeveloped; however, they are increasingly vulnerable to encroachment by informal settlements. A clear understanding of existing land-use patterns is therefore essential for effective sub-project planning particularly to avoid environmentally sensitive areas, minimize displacement risks and ensure that sub-project activities do not adversely affect community livelihoods or access to natural resources.

The proposed sub-project site is located within the existing MICT headquarters compound, within the urbanized area of Hargeisa near the Sha'ab area, which constitutes the primary governmental and administrative zone of the city. This strategic location where most government institutions are concentrated, positions the proposed building as a central and accessible hub for project coordination and implementation.

Climatic Conditions

Hargeisa experiences a semi-arid climate characterized by high temperatures, low and highly variable annual rainfall, and pronounced seasonal fluctuations. According to FAO–SWALIM meteorological data and hydrogeological assessments, the city receives an average annual rainfall of approximately 350–400 mm, the majority of which occurs during two short rainy seasons: the Gu season (April–June) and the Deyr season (October–November). These rainfall periods are interspersed with extended dry seasons Jilaal (December–March) and Hagay (July–September) which are marked by elevated evapotranspiration rates and prolonged moisture stress.

Ambient temperatures in Hargeisa typically range between 18°C and 33°C. The hottest conditions generally prevail between May and September while relatively cooler temperatures are experienced during December and January. Wind regimes are influenced by seasonal monsoon systems with strong dry winds frequently occurring during the Jilaal season. These winds often contribute to dust storms, reduced air quality and limited visibility particularly in exposed and sparsely vegetated areas.

The combined effects of irregular rainfall patterns, high evaporation rates and limited vegetation cover increase the city's susceptibility to surface runoff, soil erosion and flash flooding during periods of intense rainfall. These climatic characteristics are critical considerations for sub-project planning and implementation, particularly in the design of climate-resilient infrastructure, the scheduling of construction activities and the application of environmental and occupational health and safety safeguards. Integrating climate-sensitive measures into sub-project design and management such as Proper grading and site leveling, erosion control measures, revegetation, and using water-efficient technologies will be essential to minimizing climate-related risks and ensuring sustainable sub-project outcomes throughout the project lifecycle.

4.4. Access to Water and Electricity

- Access to water

Access to water in Hargeisa is primarily provided through a combination of centralized piped systems and privately operated water trucking services. The Hargeisa Water Agency (HWA) manages the main piped water supply network, drawing groundwater from wellfields located outside the city, notably the Geed-Deeble and Hora Haadley wellfields. However, rapid urbanization and population growth have placed increasing pressure on the existing water supply infrastructure resulting in limited coverage and intermittent service particularly in peri-urban areas and informal settlements. Consequently, a significant proportion of households depend on water vendors who distribute water via tanker trucks. Seasonal rainfall variability, extended dry periods and growing stress on groundwater resources further constrain water availability, making access to water both a social and environmental concern within the sub-project area.

For construction-related activities, water is typically sourced from government supply system and licensed private water tanker operators and temporarily stored in on site reservoirs installed for this purpose. The volume of water required for construction, combined with the limited storage capacity of these reservoirs is expected to increase the frequency of water truck movements to and from the site. This may result in localized impacts including soil compaction and degradation, increased traffic, elevated noise levels and potential disturbances to nearby communities. To address these risks, appropriate mitigation measures such as regulated water sourcing, traffic management planning, dust suppression controls and community safety measures will be established and implemented prior to the commencement of construction activities, after the project completion and during operation phase water will be obtained from Hargeisa Water Agency which is the major water supply system in the capital.

- Access to Electricity

Electricity supply in Hargeisa is primarily provided by privately owned power companies operating independent generation and distribution networks. The energy system relies largely on diesel-powered generators, although an estimated 25 percent of electricity generation is derived from cleaner energy sources. While electricity coverage in central urban areas is relatively extensive peri-urban neighborhoods continue to experience lower service reliability, frequent power interruptions and limited network expansion. Electricity tariffs remain among the highest in the region, creating affordability challenges particularly for low-income and vulnerable households. This energy supply context necessitates careful planning during sub-project implementation.

Generally, the Hargeisa Electricity is provided by private utilities including SomPower and TEC. For the new office, grid electricity will continue to be supplied through the same utility provider(s) currently serving the Ministry (SOMPOWER and TEC) after the construction completes. The Construction activities must be designed and executed to avoid damage to existing power infrastructure, ensure occupational and community safety and prevent service disruptions to neighboring institutions and residents. Appropriate coordination with electricity service providers, adherence to safety protocols and advance communication with affected stakeholders will be essential to minimizing potential inconveniences and ensuring the uninterrupted provision of essential services throughout the sub-project lifecycle.

4.5. Waste disposal

- Solid waste management in Hargeisa

The Hargeisa Municipality is responsible for solid waste collection and transportation within the city; however, service coverage remains uneven. Waste collection services are most effective in the central business district and formally planned residential areas while many peri-urban and informal settlements continue to be underserved. As a result, significant volumes of household and commercial waste are frequently disposed of in open spaces, road reserves and drainage channels, contributing to environmental pollution, obstruction of natural water ways and heightened public health risks.

Hargeisa currently lacks an engineered sanitary landfill, and existing dumpsites are largely unmanaged. These sites pose multiple environmental and social risks including soil and groundwater contamination, nuisance odors and uncontrolled waste burning. In addition, there are no dedicated systems in place for the management of electronic waste (e-waste), further exacerbating environmental challenges associated with improper disposal practices. In response to liquid waste management challenges, the Hargeisa Water Agency (HWA) in collaboration with international partners is in the process of implementing a new waste treatment system. This facility is designed to separate liquid and solid waste streams and enable the treatment, reuse and recycling of recovered materials, representing a significant improvement in urban sanitation and environmental management.

For the proposed sub-project, only licensed and authorized waste management companies will be engaged for the transportation and disposal of construction and demolition waste to designated and approved disposal facilities. The contractor will be required to establish temporary waste storage areas on-site that comply with World Bank ESF standards and the WBG EHS Guidelines including provisions for waste segregation, safe handling, containment and regular collection. These measures will be implemented to minimize environmental impacts, ensure worker and community safety and promote environmentally sound waste management practices throughout the sub-project lifecycle.

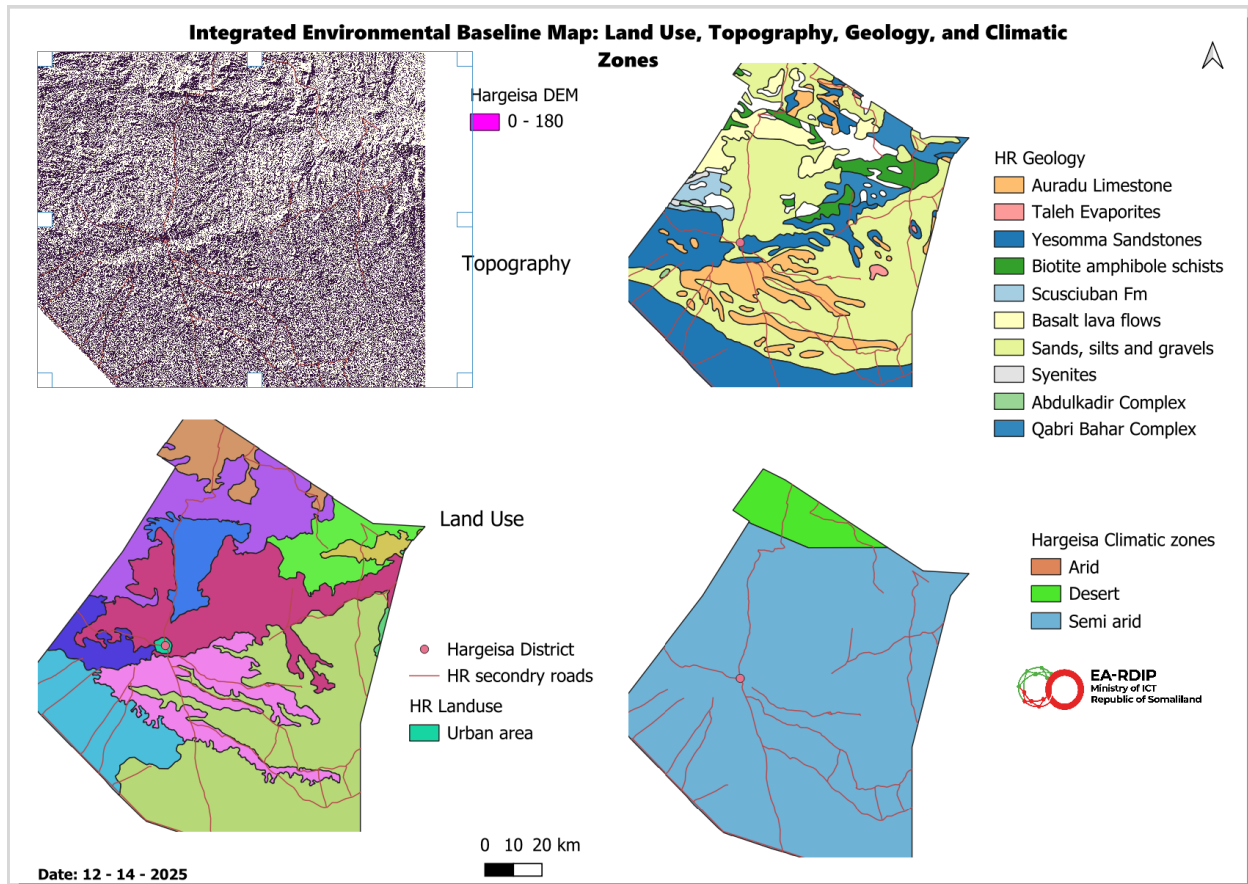


Figure 3: The map shows the Physical environment of Hargeisa district

Socio-economic Environment

• Population

Hargeisa is the capital and largest urban center of Somaliland with an estimated population of approximately 1.2 to 1.5 million people although no formal national census has been conducted in recent decades. The city has experienced rapid and sustained urban growth, driven by multiple factors including rural-to-urban migration, recurrent drought-induced displacement and the return of diaspora populations who are investing in housing, education and service sectors.

Consistent with broader demographic trends across Somaliland, Hargeisa's population is predominantly youthful with an estimated 65–70 percent of residents under the age of 30. This demographic profile presents both opportunities and challenges particularly in terms of employment generation, service provision and urban planning. Continued urban expansion is occurring at a rapid pace, placing increasing pressure on public infrastructure, land availability, housing and essential service delivery systems. These dynamics underscore the importance of integrated urban planning and sustainable development approaches to ensure inclusive growth and resilience.

- **Livelihoods and Employment**

Hargeisa serves as the primary commercial, administrative and service hub of Somaliland, hosting a diverse range of economic activities that underpin urban livelihoods. The city's economy is driven largely by trade, small and medium-sized enterprises, public administration, telecommunications, transport services, education, healthcare and substantial remittance inflows from the Somaliland diaspora. These sectors collectively sustain household incomes and support the city's role as a regional economic center.

Employment in Hargeisa is predominantly informal, often characterized by low wages, limited job security and minimal social protection, conditions that disproportionately affect youth and women. In contrast, public sector employment particularly within government institutions such as the Ministry of Information and Communication Technology (MICT) offers comparatively greater income stability and employment security. Despite ongoing economic activity youth unemployment remains critically high with estimates exceeding 65 percent. This persistent unemployment contributes to heightened vulnerability, widespread underemployment and increased migration pressures underscoring the need for inclusive economic opportunities and skills development interventions.

- **Gender-Based Violence (GBV)**

Gender-based violence (GBV) remains a critical social challenge in Somaliland, disproportionately affecting women and girls through harmful practices such as female genital mutilation/cutting (FGM/C), domestic violence and sexual harassment. Vulnerability to GBV is particularly pronounced among internally displaced women and girls who often face compounded risks due to limited access to protection services, justice mechanisms, safe housing, and sustainable livelihood opportunities.

Incidents of GBV are frequently underreported driven by entrenched social stigma, fear of retaliation, limited trust in formal justice systems and continued reliance on customary dispute resolution mechanisms that may not adequately protect survivors' rights. Although notable progress has been made through legal and policy reforms, public awareness campaigns and the gradual expansion of survivor support services, GBV remains widespread and persistent.

Given this context, development interventions including construction-related activities involving close to 200 workers must integrate proactive GBV prevention, risk mitigation and response measures. These include strengthening codes of conduct, worker training, community awareness, confidential grievance and referral mechanisms and coordination with service providers to ensure that sub-project activities do not exacerbate existing risks and that survivors can safely access support.

- **Administration and Governance**

Hargeisa is the administrative capital of Somaliland and hosts central government institutions, ministries and agencies including MICT, Local governance is exercised through Hargeisa

Municipality which is responsible for urban management, land administration, waste management and basic service oversight. Somaliland operates under a hybrid governance system combining statutory law, Islamic law (Sharia) and customary law (xeer). While institutional capacity has improved over time, enforcement remains uneven, particularly in urban land management and social protection. Government compounds such as MICT are generally secure and well-regulated environments.

- **Vulnerability and Poverty**

Although Hargeisa performs better economically than many rural areas, poverty and vulnerability remain an issue, particularly among IDPs, youth, persons with disabilities and minority groups. Recurrent droughts and climate shocks have driven large-scale displacement into urban centers, resulting in the expansion of informal settlements with limited access to water, sanitation, health services and secure housing. IDPs constitute a substantial proportion of the urban poor and are often exposed to eviction risks and social exclusion. While access to education and health services in urban areas has improved compared to rural origins, socio-economic indicators for IDPs and marginalized groups remain worse than those of non-displaced populations. These dynamics underscore the importance of inclusive planning, stakeholder engagement and social risk mitigation for infrastructure sub-projects implemented in Hargeisa.

- **Biological Environment**

The MICT office construction site is located within the existing MICT compound in Hargeisa, an urban area characterized by built infrastructure, limited vegetation cover, and minimal natural habitats. Due to its urban setting, the site exhibits low biodiversity and few ecological features of significance. Vegetation is largely confined to ornamental plants, small trees, crops and grass patches around the compound, primarily serving aesthetic or shade purposes. No natural forests, wetlands, or water bodies are present within or adjacent to the site.

Wildlife presence is limited to urban-adapted species, such as birds (e.g., pigeons, sparrows), small reptiles that lives on the trees (e.g; Gecko) and insects which are commonly found in city environments. No threatened, endangered, or endemic species have been identified in the vicinity, and the site does not serve as a critical habitat, migration corridor, or ecological buffer zone.

4. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

4.1. Environmental Risks and Impacts

- Generation of dust and particulate matter during demolition, excavation, and construction activities, potentially affecting air quality within the MICT compound and nearby offices.
- Noise and vibration from demolition works, heavy machinery, and construction equipment causing temporary disturbance to MICT staff, neighboring institutions, and nearby prayer facilities.
- Generation of construction and demolition waste, including concrete debris, scrap metal, packaging materials, and excavated soil, which may cause pollution if not properly segregated, stored, and disposed of.
- Risk of improper handling or accidental discovery of hazardous materials (e.g., asbestos-containing materials or lead-based paint) during demolition of the old structure.
- Soil erosion, surface runoff, and sedimentation risks due to site clearing, excavation, and exposure of loose topsoil, particularly during rainfall events.
- Temporary loss of vegetation and landscaping within the construction footprint, resulting in minor localized impacts on site aesthetics and microclimate.
- Potential contamination of soil and surfaces from accidental spills of fuel, lubricants, concrete slurry, or construction chemicals.
- Increased water and energy consumption during construction activities, contributing to short-term pressure on local utilities if not efficiently managed.
- Generation of greenhouse gas (GHG) emissions from construction machinery, vehicles, and material transportation, contributing to localized and indirect climate impacts

5. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

5.1. Social Risks and Impacts

- Delays in payment of workers which may lead to grievances, work stoppages, or labor disputes.
- Underpayment of workers particularly among unskilled or temporary labor, resulting in dissatisfaction and potential complaints.
- Non-transparent or perceived unfair hiring processes including concerns over favoritism or exclusion of local or vulnerable groups.
- Traffic incidents, accidents and temporary disruptions within and around the MICT compound due to movement of construction vehicles and equipment.
- Occupational health and safety (OHS) risks to workers including injuries and illnesses arising from demolition activities, handling of machinery, sharp objects, working at heights, and exposure to dust, noise or hazardous materials.
- Community health and safety risks such as increased exposure to traffic hazards, dust and noise.
- Temporary disruption to daily activities of MICT staff and neighboring offices during demolition and construction works, which may create inconvenience.
- Restricted access to work areas, posing safety risks to staff or visitors if active construction zones are not clearly marked or controlled.

Additional social risks include minor, short-term access constraints around the construction area, increased movement of construction workers, and general community concerns related to noise, dust, or navigation through the compound. There is also a low-level risk of worker-community interaction issues, including SEAH concerns, which will be mitigated through strict Codes of Conduct and awareness measures. Worker safety, grievance handling and communication gaps are other typical risks, but these will be addressed through Labor Management Procedures, a dedicated sub-project grievance mechanism and continuous stakeholder engagement with MICT departments and nearby offices. With planned safeguards, transparent communication, and close supervision, all social risks remain low, predictable, and fully controllable.

5.2. Environmental Risks and Impacts

- Generation of dust and particulate matter during demolition, excavation, and construction activities, potentially affecting air quality within the MICT compound and nearby offices.

- Noise and vibration from demolition works, heavy machinery, and construction equipment causing temporary disturbance to MICT staff, neighboring institutions, and nearby prayer facilities.
- Generation of construction and demolition waste, including concrete debris, scrap metal, packaging materials, and excavated soil, which may cause pollution if not properly segregated, stored, and disposed of.
- Risk of improper handling or accidental discovery of hazardous materials (e.g., asbestos-containing materials or lead-based paint) during demolition of the old structure.
- Soil erosion, surface runoff, and sedimentation risks due to site clearing, excavation, and exposure of loose topsoil, particularly during rainfall events.
- Temporary loss of vegetation and landscaping within the construction footprint, resulting in minor localized impacts on site aesthetics and microclimate.
- Potential contamination of soil and surfaces from accidental spills of fuel, lubricants, concrete slurry, or construction chemicals.
- Increased water and energy consumption during construction activities, contributing to short-term pressure on local utilities if not efficiently managed.
- Generation of greenhouse gas (GHG) emissions from construction machinery, vehicles, and material transportation, contributing to localized and indirect climate impacts.

6. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

The main objective of this section is to identify the E&S risks and impacts that can result from the MICT office demolition and construction and propose mitigation and management measures for each impact. The ESMP also considers the role of stakeholders, where the direct and indirect stakeholders are consulted, and their feedback is considered.

Table 3: Positive E&S Risks and Impacts

Impact	Enhancement measures	Monitoring Indicators	Frequency	Responsibility	
				Implementation	Monitoring
New facilities for vulnerable people (disabilities, women, elderly and deaf people)	Provide clear, visible and inclusive signage (using symbols, local language and Braille where feasible) to guide facility use, procure and install user-friendly, accessible fixtures and equipment designed to accommodate persons with disabilities, women, the elderly and persons with hearing impairments.	Building design Observations and reports	Monthly	Contractor	PIU ESF Team
Greening the building surroundings.	include the design to plant more trees on the landscape	Building design and completion report. Number of trees planted	Monthly	Contractor	PIU ESF Team

Technologies for clean energy, water, and material usage.	Integrate energy-efficient technologies such as LED lighting and energy-saving electrical fittings. Promote water efficiency through installation of low-flow taps, dual-flush toilets, and water-saving fixtures. Encourage the use of environmentally friendly and locally sourced construction materials with low embodied carbon where feasible. Incorporate natural lighting and ventilation in building design to reduce energy demand. Promote waste reduction through reuse and recycling of construction materials where practicable.	Number and type of energy-efficient and water-saving technologies installed. Estimated reduction in electricity and water consumption compared to conventional designs. Records of materials sourced locally or certified as environmentally friendly. Inspection and completion reports confirming installation of efficiency measures. Number of natural lighting and ventilation added into design and actual constructed building	Monthly	Contractor	PIU ESF Team
Improved health and safety measures for the PIU and MICT staff	Provide OHS and PPE equipment's Conduct regular maintenance and	Number of reported accidents Maintenance records and reports	Monthly	Contractor	PIU ESF Team

	monitoring Provide capacity building and awareness campaign for the staff	Number of capacity buildings provided to the staff			
Improvement of hygiene and sanitation statues due to provision of adequate water sanitation facilities, good drainage system and waste management system	Construct the WASH facilities as designed Provide sanitation consumables regularly Engage licensed company to handle waste management Use color coded waste management systems for temporary storage.	Contract for waste management - Procuring the necessary tools and consumable in a regular basis Number of color coded waste storage pins available at the office Number of wash facilities included in the design and constructed	Monthly	Contractor	PIU ESF Team
Improvement of livelihood for nearby small-scale businesses (restaurants and small stores) due to the increase in the number of workers involved in this sub-project	Promote Local Procurement: Encourage contractors and workers to purchase food and supplies from nearby restaurants and shops. Information Sharing: Display notices at the construction site about local businesses and services. Vendor Access: Provide safe and designated areas for small vendors near the site without disrupting	Number of Local Businesses Engaged: Track how many restaurants and shops supply goods/services to the sub-project. Volume of Local Purchases: Monitor monthly expenditure on local procurement. Business Revenue Trends: Collect feedback or simple surveys from local vendors on income changes. Worker Satisfaction: Survey workers on their use of local	Monthly	Contractor	PIU ESF Team

	construction activities. Capacity Building: Offer short training sessions for local businesses on hygiene and customer service to attract more workers. Collaboration: Establish agreements with local businesses for catering or supply contracts during peak construction periods.	services and satisfaction levels. Community Feedback: Record any complaints or positive feedback from local businesses through the GRM.			
Employment creation during the construction period	Prioritize recruitment of local labor from surrounding communities, including youth and unskilled workers, where skills are available. Apply transparent and non-discriminatory recruitment procedures in line with the Labor Management Procedures (LMP). Provide short on-the-job training and toolbox talks to enhance workers' skills,	Number of workers employed during construction (disaggregated by gender and job category). Percentage of local workers hired from the surrounding community. Number of women and vulnerable persons employed. Records of wages paid and timeliness of payments. Number of trainings/toolbox talks conducted and attendance records.	Monthly	Contractor	PIU Safeguard Team

	safety awareness, and future employability. Ensure fair wages, timely payment, and decent working conditions in accordance with national labor laws and ESS2 requirements.				

Table 4: Anticipated Negative Environmental and social Impacts

Impact	Mitigation measures	Monitoring indicators	Frequency	Phase (Design (DS), Demolition (DM), Construction (CN), and Operation (OP))	Responsibility	
					Implementation	Monitoring
Risk of excessive dust and air pollution	Implement a Dust Management Plan; conduct regular watering near sensitive areas; provide PPE to MICT staff, visitors and workers; ensure equipment is regularly serviced; limit traffic flow within the site; limit dust within the construction by applying appropriate dust suppression techniques, such as the use of water sprayers.; train MICT staff and workers on OHS and GRM and increase their awareness towards the safety	• Level of Compliance level Dust Management Plan • Inspection reports of site and equipment • Air quality monitoring report findings • Number of complaints from nearby community related to dust menace	Bi monthly	DM and CN	Contractor	PIU ESF Team

	measures, GBV, and ESMF.	Dust levels will be less than PM10 < 150 µg/m³ (daily avg)				
Noise and vibration	• Siting noisy plant and equipment as far away as possible from MICT premises and use of barriers (e.g. site huts, acoustic sheds or partitions) to reduce the level of construction noise at receptors wherever practicable; • Construction workers should be aware of the sensitive nature of workplace and advised to limit verbal / other form of noise, particularly during MICT working hours and prayer times; • Undertake regular maintenance of the construction equipment/vehicles as per the operational manual • Where practicable noisy equipment will be orientated to face away from the nearest offices and other receptors; • Working hours for significant noise generating construction work will be on daytime • Alternatives to diesel and petrol engines and pneumatic units, such as hydraulic or electric • Where practicable, stationary equipment will be in an acoustically treated enclosure;	Conducting regular Monitoring sound levels (< 65 dB during work hours) To Serviced plant and equipment to manufacturers Specification Use allowed sound levels as a standard	Bi monthly	DM and CN	Contractor	PIU ESF Team

	• For machines with fitted enclosures, doors and door seals will be checked to ensure they are in good working order; also that the doors close properly against the seals; • turned off the engines when it is not in use. • Equipment will be regularly inspected and maintained to ensure it is in good working order. The condition of mufflers will also be checked; and fitting of mufflers or silencers of the type recommended by manufacturers. . Reducing the use of noise and vibration source wherever possible					
Solid waste generation	Prepare and implement a Construction Waste Management Plan; that supports waste segregation, collection, and disposal of waste; agreement with a licensed companies that has all required permits, certifications, and approvals, with good facilities; dispose the waste into the licensed locations; prohibit open burning; maintain proper waste documentation. Provide temporary waste storage with color coded style for segregation.	Reports of waste generated quantities Reports of transported wastes Regular site inspection reports. Complaints from the communities including the MICT. 100% segregation and disposal via licensed facility	Bi monthly	DM, CN, OP	contractor	PIU ESF Team
Energy and water consumption	Reduce losses in energy distribution.	• Quantity of water and materials	Bi monthly	DM, CN, OP	Contractor	PIU ESF Team

	Where possible reuse and recycle energy and water use. Use and install instruments and equipment for better efficiency. improve energy conversion efficiency Exploit energy purchasing opportunities - o Use lower-carbon fuels • Water use efficiency to reduce the amount of wastewater generation	used from construction report. •				
Vegetation and crop clearance	• Ensure proper demarcation and delineation of the sub-project area to be affected by construction works and as much as possible avoid including the crops and trees near the site. • prepare restoration plan for indigenous trees or other fast-growing trees be planted in strategic locations where the vegetation cover will be cleared as part of landscaping initiatives; • Identify and restrict movement of vehicles to areas of disturbance. • Compensatory planting of trees at least twice the number of trees cleared. Use staged vegetation clearance so as not to always clear the	• Number of trees replanted as compensatory trees • Status of reinstatement of completed sites • State of habitats and other.	Bi monthly	DM and CN	contractor	PIU ESF Team

	entire corridor. • The use of existing cleared by the Data construction office or disturbed areas for the Contractor's Camp and compliance to the provisions of Workers' accommodation. • Whenever possible, all damaged areas shall be reinstated and rehabilitated upon completion of the contract to as near pre-construction conditions as possible. • Reinstatement of temporary construction sites, spoil dumping areas should be done as swiftly as possible and always with suitable native grasses and other plants • Where the subproject ESIA or ESMP identifies possible impacts on endangered or otherwise protected plant species, a mitigation measure would be to have a qualified botanist survey locations in advance of clearing. Also, impact on fauna due to habitat destruction and poaching by workers					
Greenhouse gas (GHG) emissions	Avoid and reduce sources of GHG emissions by avoiding, reducing and managing the sources for emissions.	Continuous monitoring of GHG emissions.	Bi monthly	DM, CN, OP	Contractor	ESF team PIU

	Control the emissions at source by using regularly serviced machineries, using low sulfur fuel, installing dust control systems, and storing materials in a closed areas..					
Soil erosion and land degradation	Restrict vegetation clearing to the sub-project footprint; backfill and compact excavated areas; install erosion control structures such as riprap, silt fencing to manage sediment and water flow; re-vegetate exposed soils upon completion.	Soil quality and level of contamination • Availability of soil analysis reports • State of habitats affected by the sub-project.	Bi monthly	DM and CN	Contractor	PIU ESF Team
Impacts on Cultural Heritage sites	Conform to provisions of finds procedures provided in Appendix 2,	Number of Cultural Heritage Sites impacted by the sub-project.	Bi monthly	DM and CN	Contractor	PIU ESF Team
Risk of cumulative impact from Nearby ongoing Data Center (20m)	- coordinate with responsible entities – establish shared schedules for main activities that include dust, noise and traffic generation - use same storage for construction material, same waste temporary and storage to minimize the adverse effect.	Timelines for implemented activities Site inspection reports Complaints from nearby communities	Bi monthly	DM and CN	Contractor	PIU ESF Team
Temporary access restrictions and disruption of MICT services	• Coordinate construction schedule with MICT management • Provide advance notice of disruptive activities • Ensure alternative access routes and temporary office arrangements	• Number of complaints received • Records of coordination meetings	Monthly	DM, CN	contractor	PIU ESF Team
Occupational	• Implement an OHS	• Accident and	Weekly	DM, CN, OP	contractor	PIU ESF

health and safety risks to workers	Management Plan • Enforce PPE use • Conduct safety trainings • Maintain first aid kits and trained first aiders on site	incident records • PPE distribution logs • Training attendance Frequency: Monthly				Team
Community health and safety risks to staff and visitors	• Restrict access to active construction zones • Fence and clearly mark work areas • Implement GRM for staff and visitors	• Incident reports • GRM records	Monthly	CN, OP	contractor	PIU ESF Team
Labor-related risks (unfair recruitment, child or forced labor)	• Enforce Labor Management Procedures (LMP) • Verify worker age (18+) • Maintain labor registry • Prohibit child labor, forced labor in contracts and CoCs	• Labor registry records • Spot-check reports Frequency: Monthly	Monthly	CN, OP	contractor	PIU ESF Team
Exclusion of women, Persons with Disabilities (PWDs) or vulnerable groups from employment opportunities	• Promote inclusive recruitment practices • Encourage employment of women and persons with disabilities where feasible	• Employment records disaggregated by gender	Quarterly	CN, OP	contractor	PIU ESF Team
Communicable disease transmission (e.g. TB, HIV/AIDS)	• Implement and publicize the Sub-project GRM • Ensure timely response and resolution of complaints	• % grievances resolved • Grievance logs	Continuous	DS, DM, CN, OP	Contractor	PIU ESF Team
Risk of poor implementation of	Conduct regular	Number of complaints	Continuous	DM and CN	Contractor	PIU ESF

the ESMP	monitoring site visits Make sure contractors has the required staff PIU ESF team will make sure to train the contractor's lead experts The contractor will Provide EHS training for the workers Install GRM on the site	reported Site inspection reports	us			Team
Risk of lack of establishment for stakeholder feedback integration mechanism into the sub-project decisions	• Conduct regular consultation meetings to identify community needs • Develop a GRM to obtain community complaints regularly • Prepare minutes from the conducted stakeholder engagements • Disclosure sub-project information to public	• Number of complaints received and resolved • Reforms to the initial design • Reports and minutes prepared from the stakeholder engagements	Continuous	(DS), (DM) and (CN).	Contractor	PIU ESF Team

7. MONITORING AND REPORTING

7.1. Objectives of Monitoring

The objective of this section is to ensure that the mitigation measures proposed in the ESMP are effectively implemented by the Contractor and to identify any environmental or social issues that arise during the pre-construction, construction and operations phase of the MICT office.

Regular field visits would be conducted by the ESF team to make sure the compliance with guidelines of ESMP that are prepared in accordance with the WB standards and OHS guidelines and national regulations. The Contractor will be responsible for implementing the mitigation measures outlined in the ESMP through preparing and implementing a specific Contractor Environmental and Social Management plan (C-ESMP) that clearly identifies the specific mitigation and enhancement measures for each impact, and the PIU will conduct frequent monitoring activities to check the compliance.

The PIU ESF team will be responsible monitoring and reporting, this will be achieved through for collecting, verifying, and collating information, integrating the M&E reports, and submitting to the World Bank the monthly, quarterly and after sub-project completion reports.

Monitoring will help to:

- Improve E&S management practices.
- Check the efficiency and quality of the Environmental Audit (EA) processes;
- Establish the reliability and credibility of the EA for the sub-project (as well as the quality of experts providing EA services)
- Provide the opportunity to report the results on safeguards and impacts and proposed mitigation measures implementation.

7.2. Internal Monitoring and Reporting

Internal Monitoring shall begin once E&S sub-project documents are approved and disclosed. This ensures that the :

- Mitigation measures identified in the planning phase (contained in the ESMP report) and incorporated in the sub-project design and cost are being implemented.
- These mitigation measures are maintained throughout the pre-construction and construction phase, and where applicable in the operation phase, and to the decommissioning of sites, facilities and equipment;
- Additional remedial actions are identified (including corrective measures or redesign of mitigation measures), where relevant.

The monitoring by MICT PIU shall actively and effectively monitor the contractors engaged in the implementation of office construction and covers other areas such as adherence to the environmental and social clauses and principles. The C-ESMP that is prepared also be monitored.

The monitoring results will be analyzed, and the monitored information and recommended actions will be compiled for the attention and action of the respective implementing agencies. The monitoring report will be formalized with the agreed actions and timeframes and submitted to the PIU PC and the Bank.

The sub-project shall have a monitoring reporting form which shall provide monthly, quarterly, and project completion reports. This will include:

- List of consultations held, including locations and dates, name of participants and designations.
- Main points arising from consultations including any agreements reached.
- A record of grievance applications and grievance redress.
- Construction supervision reports that include assessment of contractor's compliance with safeguards;
- Progress report on technical, E&S studies, designs E&S instruments
- Progress report on Capacity Building plan
- Safeguards staff at the regional level will prepare consolidated quarterly monitoring reports on respective sub- projects

7.3. World Bank Supervision

The Bank will provide the second line of monitoring compliance and commitments made in the ESMP through implementation support missions. The Bank will undertake monitoring during its scheduled biannual implementation, support missions or other missions specific to this sub-project. The contractor will be required to submit to the monthly, quarterly monitoring reports and sub-project completion reports to the PIU will consolidate and summarize these reports and submit to the Bank as part of its reporting to the Bank and the Bank supervision missions will review these reports and provide feedback

.

Table 5: ESMP Monitoring and Compliance Reporting

Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
EHS Monitoring report to PIU	Compliance status of the subproject with the E&S mitigation and monitoring measures. The report shall cover: Environmental incidents; Health and safety incidents, identification of child and forced labor; Health and safety supervision; Usage of PPEs by workers; Highlights of inspections; Training conducted, and workers participated; workers grievances submitted and their response status.	Weekly	Contractor
ESMP report to PIU	Compliance status of overall subproject with ESMP requirements	Monthly	Contractor
Incident and accident report	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to prevent and address future recurrence of a similar event	Initial Notification report for severe incidents within 24 hours. Detailed Investigation Report within ten days	contractor
Incident report from PIU to WB	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and corrective actions taken to prevent and address future recurrence of a similar event	Initial investigation report for severe incidents within 48 hours. Detailed Investigation Report within ten days	PIU

Consultations reports	Consultation activities documented the engagement objectives, stakeholders consulted, locations and dates of meetings, and key issues raised by communities and authorities. The report summarizes consultation methods used, concerns and feedback received, agreed mitigation measures, and how stakeholder inputs were integrated into sub-project design and ESMP implementation, including records of participation and outcomes.	Monthly	contractor
Progress report on Capacity Building plan	Capacity building targeted sub-project staff and local workers, covering E&S management, OHS, community safety, GRM, Code of Conduct, waste management, and emergency response. Trainings were delivered through toolbox talks and on-site briefings before and during construction, led by the Contractor's E&S and OHS focal persons. Attendance was recorded with gender disaggregation, and the activities improved ESMP compliance and site safety.	Weekly	contractor
GRM progress report	The training will cover GRM processes, roles, and timelines for communication through site briefings and community awareness sessions, with designated focal persons	Weekly	contractor

	responsible for grievance management. Also, the Grievance logging, tracking, and resolution process in a timely manner.		
--	---	--	--

8. INSTITUTIONAL IMPLEMENTATION ARRANGEMENTS AND RESPONSIBILITIES

Table 6: Institutional Implementation arrangements and Responsibilities

Institution Entity	Role
MICT/PIU	The PIU will be responsible for the overall implementation of the sub-project; the PIU ESF specialists will be responsible for overall supervision and monitoring of the sub-project implementation. Specifically, the PIU GBV, Environmental, and Social Specialists are responsible for managing the E&S risks of the sub-project and responsible for monitoring the implementation of this ESMP. The PIU will monitor contractor and subcontractor E&S performance and ensure the contractor monitors its own and all subcontractors' E&S performance throughout construction, including mobilization, the main construction phase, and demobilization. all contractors engaged on the sub-project are required to operate in a manner consistent with the requirements of the ESSs, including the specific requirements set out in the Environmental and Social Commitment Plan (ESCP).
Contractor	The contractor is responsible for complying with requirements for all field activities covered by this ESMP, the contractor is also responsible to ensure that all its sub-contractors follow the ESMP and other ESF instruments that apply to this sub project. The contractor will have contractual clauses specifying compliance with the mitigation measures listed in the ESMP and in the WBG's EHS Guidelines, in addition to national requirements and to indicate measures taken in cases of non-compliance. The contractor is also responsible for the actions of any subcontractors they may engage. Sub-contractors also have to comply

	with all E&S Standards as laid out in this ESMP. Contractor's responsibilities include: ▪ Ensuring that all operations comply with the ESSs and mitigation measures laid out in this ESMP, for which the contractor is responsible and will develop and implement a Constructor ESMP (C-ESMP). ▪ Ensuring that the control measures provided for in the ESMP are both understood and implemented by site personnel. ▪ Complying with accident and incident reporting as laid out in the ESMF. All severe incidents must be reported to MICT/PIU within 24 hours of occurrence. ▪ Setting up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies. ▪ Monitoring the C-ESMP implementation, against the monitoring indicators laid out in the ESMP Table. ▪ Organizing and participating in Community Consultative Meetings with an approach to adaptive sub-project management as necessary. ▪ Identifying additional significant matters pertaining to environmental and social compliance. ▪ Liaise with MICT/PIU on the need for corrective action in the event of unexpected environmental or social issues emerging during operations. ▪ Communicating with all staff regarding E&S compliance requirements and other matters of importance. ▪ Identifying additional environmental mitigation or corrective measures that are deemed to be necessary during sub-project implementation. ▪ Preparing reports on all aspects of E&S compliance. ▪ Maintaining lists of all workers, including their age and gender. ▪ Maintaining and adequately operating a workers' GRM. ▪ Prepare and implement an OHS Plan and provide related and frequent training to all workers. ▪ Ensure signing of the code of conduct by every worker, covering issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse. ▪ Implementing the Security Management Plan (SMP). ▪ The contractor is obliged to implement this ESMP, operationalized through the C-ESMP with all risk mitigation measures assigned to it. The PIU should require contractors to report on an agreed frequency their E&S performance and metrics (which shall include relevant information
--	--

	and data from subcontractors, as applicable). Timely reporting of E&S performance and results enables the client to identify opportunities for improvement, prevent poor performance issues, and assist contractors if remedial action is to be taken. Given that majority of the anticipated environmental and social risks and impacts will occur during the construction phase, the contractor will be contractually bound to prepare and implement a C-ESMP consistent with the associated E&S instruments. The implementing entities will ensure the C-ESMPs summarize the context, interested parties, compliance requirements, checks for compliance, risks and opportunities, activity-specific environmental and social objectives and specific targets, training plans, inspections, peer reviews and other monitoring actions and incidents as discussed. The C-ESMPs will inform the actions expected from the respective contractors and others.
Contractor E&S Risk Management or Environmental Health and Safety (EHS) Specialist:	The contractor will deploy an E&S or EHS Specialist to ensure operationalization of this ESMP and adequate implementation of the C-ESMP, including monitoring, supervision and reporting on mitigation measures. The key tasks of the Specialist are to; ▪ Ensure PPE for workers is available and workers are trained in its use and comply with it ▪ Provide OHS training to all workers, based on the OHS Plan ▪ Ensure health and safety of all workers at the construction site ▪ If necessary, stop the works to ensure safety ▪ Maintain records of accidents and incidents and ensure appropriate reporting of incidents to the supervision consultant and MICT/PIU ▪ Ensure waste management procedures are followed closely ▪ Ensure availability of water and sanitation facilities for all workers at site and at the campsite ▪ Conduct toolbox talks for workers ▪ Train all workers in the CoC and ensure that CoC is signed by every worker ▪ Liaise closely with the supervision consultant and PIU on training workers on GBV issues, as well as community awareness on GBV ▪ Maintain workers' lists indicating age and gender ▪ Liaise closely with the supervision consultant and MICT/PIU on the implementation of Sub-project GRM ▪ Maintain records of workers' GRM
Sub-contractors x	Sub-contractors are responsible for complying with all Environmental and Social (E&S) requirements applicable to the sub-project, as outlined in this ESMP, the Contractor's ESMP (C-ESMP), the ESCP, the ESMF, the World

	Bank Environmental and Social Standards (ESSs), the WBG EHS Guidelines, and relevant national regulations. Sub-contractors shall operate under the supervision of the main contractor and remain fully accountable for their assigned scope of work. Sub-contractors' responsibilities include: • Complying with all mitigation measures and E&S obligations assigned to them under the C-ESMP and related instruments. • Ensuring that all their site activities are conducted in accordance with the ESSs and national environmental, labor, and OHS requirements. • Ensuring that all workers receive appropriate induction and training on OHS, Code of Conduct (CoC), GBV/SEA/SH prevention, and environmental protection measures. • Providing adequate and appropriate Personal Protective Equipment (PPE) to all workers and enforcing its use. • Implementing proper waste management practices in line with the ESMP and site procedures. • Preventing pollution, including dust, noise, wastewater discharge, and hazardous material spills. • Immediately reporting accidents, incidents, near misses, or environmental and social non-compliance issues to the main contractor. • Maintaining accurate records of workers, including age and gender, and ensuring no child labor or forced labor is employed. • Supporting and cooperating in the operation of the workers' Grievance Redress Mechanism (GRM). • Ensuring that all workers sign and comply with the Code of Conduct. • Cooperating with the contractor, supervision consultant, and PIU during monitoring, inspections, and audits. Sub-contractors remain contractually bound through the main contractor to fully adhere to all environmental and social obligations. Failure to comply may result in corrective measures, penalties, or termination of the subcontract agreement.
World Bank	The Bank will be responsible for the final review and clearance of environmental and social assessment instruments; Where possible conduct supervision missions to check on the performance of MICT office construction and assess its compliance to agreed grant

	covenants and environmental and social instruments; and Recommend measures for improving the performance.
--	---

8.1.1. E&S Performance Meetings

Regular meetings with the PIU/MICT Project Coordinator; the PIU GBV/SEAH Specialist, the PIU Environmental Specialist; the PIU Social Specialist; the Supervising Engineer; the Contractor's Project Manager; the Contractor's E&S/OHS Officer; the Contractor's GBV/SEAH focal point (where applicable) and the Security focal point (if security is deployed) are essential to ensure contractor performance is satisfactory and that project specifications are being met. Additional participants may be invited as needed, including relevant MICT departmental representatives, local authority representatives and community liaison/GRM focal points to address site-specific community health and safety or access-related issues. The PIU will share performance-monitoring results at weekly meetings with the contractor to effectively drive improved performance. The PIU ESF specialists who control contractor performance and conduct monitoring of staff also needs to be clarified and understood by contractors (for example, who gives instructions to stop work or proceed but with modifying the approach, scope, equipment, and so forth).

The PIU should ensure that contractors employ qualified E&S personnel to oversee E&S performance, and that contractor staffing and resources are commensurate with the magnitude and timing of work and potential E&S risks. The PIU should also approve documentation, including training programs, to ensure all staff are aware of E&S commitments and their part in meeting them.

8.1.2. Review and Approval of Contractor Site-Specific E&S plans

The PIU is responsible for its contractors, meeting all of the sub-project's E&S requirements, it is essential for them to review and approve sub-project E&S management plans and procedures. These might include such plans as working within boundaries (footprint management), protection of biodiversity, land clearing and erosion control, traffic management, labor sources and methods of recruitment of workers, worker accommodation, noise and dust control, and possibly others. Where an E&S Management Plan has not been approved, no works will commence in the area.

8.1.3. Kickoff Meeting

Prior to early work activities, the PIU should hold a kickoff meeting with the contractor prior to arriving at the site. Timing of mobilization based on logistical issues, resources, and so forth should be considered in the planning. The PIU and contractor sub-project managers and major subcontractors should participate in these meetings. The purpose is to review planned activities and schedules, review E&S requirements (among others), review the roles of the various parties in implementing and monitoring mitigation measures, and agree on sub-project-specific induction and training content. These meetings (Kickoff and E&S performance) should include a discussion

about control of access to the site, use of security forces if applicable, and how to best coordinate the PIU's security management system and E&S activities at both the base camp (accommodation site) and any remote construction sites. Both MICT and contractor E&S representatives should be present to reiterate all E&S commitments and establish initial compliance points and coordination requirements during site establishment.

9. REPORTING AND MONITORING ON ESMP COMPLIANCE

The effective implementation of this Environmental and Social Management Plan (ESMP) and the Contractor's Environmental and Social Management Plan (C-ESMP) is highly dependent on the capacity, awareness, and commitment of contractors' personnel, sub-project workers, surrounding communities, and other relevant stakeholders. To ensure compliance with environmental and social requirements and to promote safe and responsible sub-project execution, targeted capacity-building and training activities will be undertaken throughout the sub-project lifecycle, with a strong emphasis on the pre-construction phase.

Training workshops will be conducted to enhance understanding of the sub-project's environmental and social obligations, raise awareness of potential risks, and strengthen the ability of site personnel to effectively implement mitigation measures. Particular attention will be given to workers directly involved in construction and site operations, as they play a critical role in managing day-to-day environmental, social, health, and safety risks.

All on-site workers will receive mandatory training prior to the commencement of construction activities. These training sessions will be delivered by qualified personnel and will be included in the contractor's budget as part of contractual obligations. Refresher training will be provided as needed during implementation to reinforce compliance and address emerging risks.

At a minimum, the training program for construction workers will cover the following topics:

- Occupational Health and Safety (OHS) requirements, including hazard identification, use of personal protective equipment (PPE), and safe work practices.
- Environmental and social mitigation measures to be applied in accordance with the ESMP and C-ESMP.
- Prevention of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH), including adherence to Codes of Conduct.
- Prevention, reporting, and management of workplace accidents, as well as the preparation and implementation of emergency response and preparedness plans.
- Roll-out and use of the Grievance Redress Mechanism (GRM) for workers and surrounding communities.
- Proper segregation, handling, transportation, and final disposal of solid and construction waste.

10. STAKEHOLDER ENGAGEMENT

Introduction

Stakeholder engagement for the MICT office Construction Sub-project has been conducted in line with the Project SEP and the World Bank Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure (ESS10), with the objective of ensuring meaningful, inclusive and culturally appropriate engagement with all institutions and communities that may be directly or indirectly affected by the reconstruction works within the MICT compound.

Stakeholder engagement activities included pre-construction information sessions, focused discussions with neighboring institutions and two formal stakeholder consultation meetings held on 10–11 December 2025 (ANNEX 6). These consultations provided a platform to disclose key sub-project information, including sub-project objectives, anticipated environmental and social impacts, proposed mitigation measures and temporary relocation arrangements. Stakeholders were given the opportunity to raise concerns, seek clarification and provide recommendations all of which were carefully reviewed and incorporated into the final sub-project design and environmental and social management measures.

Stakeholder Mapping

A systematic stakeholder mapping exercise was undertaken by the ESF PIU Team to identify all stakeholders with an interest in, influence over or potential exposure to the environmental and social risks and impacts of the sub-project. Stakeholders were categorized based on their relationship to the sub-project, level of influence, degree of impact and vulnerability ensuring that engagement approaches are proportionate and responsive throughout the sub-project lifecycle.

Table 7: Stakeholder Mapping Table

Stakeholder Group	Category	Key Concerns / Interests	Level of Impact	Engagement Approach
MICT (HR & Postal Services Departments)	Directly Affected	Temporary relocation, workspace disruption, safety, access	High	Formal meetings, written notices, relocation briefings
EARDIP PIU	Directly Affected	Office functionality, coordination, OHS	High	Regular coordination meetings
Neighboring Government	Indirectly Affected	Noise, dust, traffic, access	Medium	Information sessions,

Institutions		disruption		advance notifications
Contractors & Sub-contractors	Sub-project Actors	ESF compliance, labor conditions, OHS	High	Contractual requirements, site meetings
Construction Workers	Affected Individuals	Workplace safety, wages, SEA/SH risks	High	Site inductions, worker GRM
Hargeisa Municipality	Institutional	Waste management coordination	Medium	Official coordination
Civil Society & Development Partners	Interested Stakeholders	Safeguards performance	Low	Information sharing
Vulnerable and Disadvantaged	Indirectly Affected	Traffic and road safety	Low	Advance notification of traffic movements, Visible on-site communication

Primary Stakeholders

Primary stakeholders are individuals, groups, or institutions that are directly affected—positively or negatively—by the project’s activities, or that have a direct interest or influence in its implementation and outcomes.

Primary stakeholders include government institutions located within or adjacent to the MICT compound. These stakeholders have varying levels of interest and influence due to their proximity to construction activities, potential exposure to temporary disturbances and their operational interdependencies with the Ministry.

- MICT Departments and PIU Teams
- Mosque adjacent to MICT
- Silanyo National Library
- Red Crescent / ICRC
- Telesom Electricity Company (TEC)
- Taiwan/ICDF Data Center Construction Team
- Ministry of Health (MoH)
- MICT Security Personnel
- PIU Staff Temporarily Relocated During Construction

Vulnerable Groups

While the sub-project is located within a government compound, certain groups may be disproportionately affected by construction disturbances. Engagement methods prioritized clear communication, respectful timing around prayer hours, and accessible GRM channels to ensure these groups remained informed and protected.

- 1 small business near MICT.
- Students and youth use the National Library (sensitive to noise).
- Elderly individuals attending the mosque (noise, dust, mobility).
- Women accessing prayer spaces in the mosque (privacy, safety).
- Temporary MICT staff relocated to alternative working spaces (comfort and accessibility).



Figure 4:: Shows stakeholder nearby stakeholders

Stakeholder Consultations: Feedback and PIU Responses

Table 8: Stakeholder feedback and PIU response

Issues/Points Raised	Stakeholder(s)	Responses
Noise during prayer and library hours	Mosque, Library	Adjust construction schedule; restrict high-noise activities; issue advance notices
Dust and air quality concerns	Mosque, MICT staff, Library	Implement dust suppression; cover materials; close mosque-facing door temporarily
Traffic congestion from heavy vehicles	ICRC/Red Crescent, TEC, Data Center team	Traffic Management Plan; schedule deliveries; use TEC garage alternative route
Safety concerns	Mosque	Install CCTV; implement controlled access; fencing of construction site.

Coordination with ongoing Taiwan/ICDF project	ICDF Data Center	Joint meetings; synchronized scheduling
Safe temporary relocation	MICT Departments	Identify and prepare temporary workspaces; inform staff of relocation plan
Safe temporary relocation	MICT Departments	Identify and prepare temporary workspaces; inform staff of relocation plan
Ensuring high construction standards	MoH, Mosque	Integrate OHS measures; ensure ESMP compliance

Table 9 identifies the key stakeholders involved in the MICT office Construction Sub-project and summarizes their respective needs, interests and expectations across the sub-project lifecycle. It serves as a tool to ensure that all stakeholder groups including MICT staff, PIU teams, contractors, neighboring institutions and surrounding community members receive timely, relevant and accessible information. The table also supports the systematic addressing of stakeholder concerns through targeted and proportionate engagement measures, implemented in accordance with the Stakeholder Engagement Plan (SEP).

Table 9: Stakeholder needs

Stakeholder Group	Needs	How This Will Be Addressed
Mosque Community	Quiet during prayer, security, boundary clarity	Scheduling of construction works, fencing, door closure by installing lockable controlled gates, warning signages, notifications of the construction times
Library Users	Minimal noise, predictable disruptions	Advance notices of planned construction times, daytime restrictions on noisy work, noise barriers
ICDF Construction Team	Cumulative impact management	Joint meetings and shared scheduling of construction activities

MICT Staff	Safe relocation, routine continuity	Clear relocation plan, communication, GRM access, OHS measures, impact mitigation
Ministry of Health (MoH)	Safe movement and hygienic environment	Pathway management, dust suppression
Vulnerable Groups	Accessibility, safety, advance information	Tailored communication

Consultation Stages and Methods

This table outlines the different stages of the sub-project where stakeholder consultation is required and specifies the appropriate methods for engaging each group. It ensures that communication remains timely, inclusive and responsive throughout the sub-project in alignment with the Project SEP and ESS10.

Table 10: Consultation stages

Consultation Stage	Responsible Party	Target Group	Method of Engagement	Purpose
Pre-Construction	PIU Safeguards Team	All identified stakeholders	Meetings, presentations, written notices	Introduce sub-project, disclose impacts, gather feedback
Technical Coordination	PIU, Contractor, TEC, ICDF	TEC, ICDF, MICT technical teams	Joint meetings, site coordination	Manage cumulative impacts, align schedules
Ongoing Engagement	PIU Social Specialist	All stakeholders	Meetings, OHS Signage, Toolbox, signage, GRM, WhatsApp, email	Maintain safety, manage risks, communicate disruptions

Information Disclosure

This table outlines the key methods that will be used to share timely, accessible and transparent information about the project with MICT staff and other stakeholders. These disclosure channels ensure that all affected parties remain informed about construction activities, timelines, safety measures and any changes that may impact them.

Table 11: Information disclosure

Disclosure Method	Description / Purpose
Public notices posted at MICT	Displayed on notice boards and key entry points to inform staff and visitors about construction activities, timelines, access changes and safety measures.
SMS/WhatsApp notifications to affected departments	Quick, direct updates shared with relevant MICT departments to communicate urgent changes, schedules, or safety alerts.
Email updates	Formal communication providing detailed sub-project information, progress updates, planned works and consultation invitations.
Suggestion / Information Box at MICT	A physical box placed in a visible location to allow staff and visitors to submit questions, concerns and feedback confidentially regarding sub-project activities.
Communication in Somali language (translated ESF Somali documents)	Ensure information is accessible to all MICT staff and visitors, improving understanding and inclusivity.

This table outlines the key measures that will ensure continuous, transparent and well-coordinated communication throughout the construction period. These actions help keep MICT staff informed, address inquiries promptly and maintain safety and awareness around the sub-project site.

Table 12: Communication measures

Communication Measure	Description / Purpose
Monthly progress updates	Regular updates shared with MICT departments and stakeholders summarizing construction activities, completed works, upcoming tasks and any anticipated disruptions.
Dedicated contact person for inquiries – Ask Saed	A designated focal person is available to respond to questions, concerns and clarification requests from MICT staff and visitors throughout the sub-project.
Regular site visits with MICT focal points	Joint walkthroughs to review progress, identify

	issues early and ensure alignment between the contractor, PIU and MICT administration.
Signage at the site indicating restricted zones and safety information	Visible signs installed around the construction area to guide safe movement, mark hazardous zones and communicate essential safety instructions to staff and visitors.

11. CAPACITY BUILDING AND TRAINING

The effective implementation of this ESMP and the C-ESMP is highly dependent on the capacity, awareness and commitment of contractors' personnel, sub-project workers, surrounding communities and other relevant stakeholders. To ensure compliance with environmental and social requirements and to promote safe and responsible sub-project execution, targeted capacity-building and training activities will be undertaken throughout the sub-project lifecycle with a strong emphasis on the pre-construction phase.

Training workshops will be conducted to enhance understanding of the sub-project's environmental and social obligations, raise awareness of potential risks and strengthen the ability of site personnel to effectively implement mitigation measures. Particular attention will be given to workers directly involved in construction and site operations as they play a critical role in managing day-to-day environmental, social, health and safety risks.

All on-site workers will receive mandatory training prior to the commencement of construction activities. These training sessions will be delivered by qualified personnel and will be included in the contractor's budget as part of contractual obligations. Refresher trainings will be provided as needed during implementation to reinforce compliance and address emerging risks.

At a minimum, the training program for construction workers will cover the following topics:

- Occupational Health and Safety (OHS) requirements including hazard identification, use of personal protective equipment (PPE) and safe work practices.
- Environmental and social mitigation measures to be applied in accordance with the ESMP and C-ESMP.
- Prevention of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) including adherence to Codes of Conduct.
- Prevention, reporting and management of workplace accidents, as well as the preparation and implementation of emergency response and preparedness plans.
- Roll-out and use of the Grievance Redress Mechanism (GRM) for workers and surrounding communities.

- Proper segregation, handling, transportation and final disposal of solid and construction waste.

These objectives will be achieved through the delivery of targeted induction workshops for all sub-project workers at the outset of the construction phase. These induction sessions will ensure that workers clearly understand their environmental, social, health and safety responsibilities before commencing site activities. Throughout the construction phase, periodic refresher trainings will be conducted to reinforce compliance, address emerging risks and incorporate lessons learned during implementation.

In addition to worker-focused training, surrounding communities and site-adjacent stakeholders will be engaged through structured awareness-raising sessions. These sessions will aim to enhance community understanding of sub-project-related processes, rights and safeguards with particular emphasis on the following topics:

- The Community Grievance Redress Mechanism (GRM) including how grievances can be submitted, addressed and resolved in a confidential and accessible manner.
- Gender-Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) prevention and response measures including available support services and referral pathways.

Table 13: Stakeholder Engagement objectives, method and target group

Objectives	Issues for engagement	Method of engagement	Stakeholders/Target population and area	Responsible person	Time frame
Induction Training	A general E&S site induction for all workers, with specialized technical E&S training delivered to staff. The training will cover ESMF, SEP, LMP, and GRM for all personnel, including contractors and subcontractors. All workers should be made aware of the worker GRM and Sub-project GRM and how to access them.	Face-to-face	The Contractor	PIU ESF Team	Prior to commencement of activities
Sub-project GRM	Consultation on different GRMS mechanisms in place, development of overall GRM, and Training with all	Consultations and Training	Technical Leads / relevant staff responsible for the implementation	PIU	Prior to commencement of activities

	Technical Leads Set up Grievance Redress Mechanism and functioning		of E&S instruments.		
OHS standards	H&S Standards for workers, Monitoring Occupational Health and Safety (OHS) Leadership, Management Safety performance assessment Hazard Analysis and Control Hazard Communication. Program Effective Accident Investigation, Conducting Health and Safety Audits Job Hazard Analysis, Occupational Health Risk Assessment Work Stress Risk, Assessment Electrical Safety Fire Safety, Fall Protection Plan and Fleet Safety Management	Training	Contracted workers in Sub-project locations	Contractor's Technical leads	Prior to commencement of activities
Create awareness of LMP and H&S Standards for workers	LMP and H&S Standards	Training	Contracted workers in Sub-project location	Contractor's Technical leads	Prior to commencement of activities
Support Emergency Response Measures	Communication of Emergency Response Measure (ERM) to communities	Information, training	Communities in Sub-project area	PIU	Prior to commencement of activities
GBV Action Plan	Training of all Technical Leads in the GBV Action Plan	Training	Communities in sub-project areas	PIU	Prior to the implementation
GBV Procedures for	Training of all Technical Leads in the GBV procedures for reporting	Training	Contractor's Technical leads	PIU	Prior to commencement of activities

Reporting and Prevention					

12. IMPLEMENTATION BUDGET

The budget items for the implementation and management of this ESMP will be part of the sub-sub-project Contractor costs, while the PIU budget for the ESMP activities are summarized in the table below.

Table 14: The PIU Budget for ESMP Monitoring and Training for the EARDIP sub-project

No	Item description	Frequency/Sub-project cycle	Estimated Cost (USD)
1	Community consultation meeting with 30 persons	4	1,000
2	Capacity building	Lump sum (LS)	2,500
3	Grievance Redress Mechanisms	LS	1,000
4	Sub-project staff workshop with Data center	1	500
5	Translation and public disclosure		2,000
6	M&E	6	0
		TOTAL	7,000

13. GRIEVANCE REDRESS MECHANISMS

13.1. Overview

The Grievance Redress Mechanism (GRM) for the construction of the MICT office will function in alignment with the broader EA-RDIP GRM Manual. The objective is to provide a transparent, accessible, and timely system for receiving, evaluating, and addressing grievances from sub-project-affected persons (PAPs), community members, and workers arising specifically from the construction activities at the MICT premises.

13.2. Channels for Reporting

To ensure accessibility, the following channels will be established at the construction site:

- **Physical Suggestion Box:** Secure boxes located at the entrance of the construction site and the MICT main building.
- **In-Person:** Complaints can be made directly to the Contractor's Social/EHS Officer or the PIU Community Liaison Officer.
- **Hotline/Phone:** Utilization of the sub-project-wide toll-free hotline and WhatsApp number (as defined in the GRM Manual).
- **Email:** Submission via the dedicated project grievance email.

Grievance Resolution Tiers

- **Tier 1: Site Level (Contractor & PIU Site Engineer):** The Contractor is responsible for resolving minor issues (e.g., dust, noise, worker conduct) within 48 hours. The Contractor must maintain a daily log of complaints.
- **Tier 2: PIU Level (Grievance Redress Committee):** If the issue is not resolved at the site level, it is escalated to the PIU Grievance Redress Committee (GRC). The GRC includes the PIU Social Specialist and local community elders.
- **Tier 3: Appeals/National Level:** Unresolved grievances are escalated to the Ministry (MICT) leadership or the Judiciary system if necessary.
- **Tier 4: World Bank:** 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). Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, because of WB non-compliance with its policies and procedures.

Management of GBV/SEA/SH Grievances

Grievances related to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) will be handled with strict confidentiality and a survivor-centered approach.

- No Investigation by Contractor: The Contractor is not permitted to investigate GBV cases.
- Referral: All GBV-related complaints must be immediately referred to the PIU GBV Specialist.
- Support: The survivor will be immediately linked to the referral pathway (medical, psychosocial, and legal support) as detailed in the EA-RDIP GBV Action Plan.

Workers' GRM

A specific mechanism will be available for construction workers (contracted and daily labor) to report issues regarding wages, safety, and working conditions without fear of retaliation. Workers will be inducted on this process upon hiring.

Project GRM

Hotline: [9088](tel:9088)

Email: grm@eardipsomaliland.org

Focal person: Muna Ibrahim Ahmed, Social specialist

14. CONCLUSION AND RECOMMENDATIONS

14.1. CONCLUSIONS

Effective reporting and monitoring are critical to ensuring that the Environmental and Social Management Plan (ESMP) for the MICT office Construction sub-project is implemented in full compliance with the World Bank Environmental and Social Framework (ESF), national regulations, and applicable EHS Guidelines. The established monitoring and reporting arrangements provide a structured mechanism for tracking contractor compliance, identifying emerging environmental and social risks, and implementing timely corrective actions. Regular site inspections, systematic documentation, and transparent reporting to the PIU and the World Bank will support continuous improvement in environmental, social, health, and safety performance throughout the demolition, construction, and operation phases. Overall, the monitoring framework is adequate to ensure that anticipated risks remain manageable, predictable, and within acceptable limits.

14.2. Recommendations

- Ensure strict and consistent implementation of the monitoring and reporting schedule, including weekly, monthly, and quarterly reports as outlined in the ESMP.
- Strengthen the capacity of the Contractor and PIU staff through regular training on ESMP compliance, reporting requirements, and incident management procedures.
- Maintain clear documentation of all monitoring activities, including site inspection reports, incident and accident records, training attendance, and grievance logs.
- Promptly report and investigate any significant environmental, social, or OHS incidents in accordance with World Bank notification timelines and procedures.
- Use monitoring findings proactively to update mitigation measures and improve site management practices where gaps are identified.
- Ensure that grievance redress data and stakeholder feedback are systematically integrated into monitoring reports to enhance transparency and accountability.
- Facilitate periodic joint monitoring visits involving the PIU, Contractor, and relevant authorities to strengthen oversight and coordination.
- With the effective implementation of these recommendations, the reporting and monitoring system will provide a robust assurance mechanism for ESMP compliance and contribute to the successful, safe, and environmentally and socially responsible delivery of the MICT office Construction sub-project.

References

- EARDIP Somaliland. (2024). Environmental and Social Management Framework (ESMF). Government of Somaliland.
- EARDIP Somaliland. (2025). Environmental and Social Commitment Plan (ESCP). Government of Somaliland.
- Food and Agriculture Organization of the United Nations (FAO-SWALIM). (2021). Somalia land and water resources: Climate and environmental baseline. FAO.
- Hargeisa Municipality. (2021). Urban development and solid waste management overview. Hargeisa, Somaliland.
- Hargeisa Water Agency (HWA). (2023). Water supply and sanitation status report. Hargeisa, Somaliland.
- Intergovernmental Authority on Development – Climate Prediction and Applications Centre (ICPAC). (2020). Horn of Africa climate outlook. ICPAC.
- International Finance Corporation (IFC). (2007, updated 2019). Environmental, health, and safety (EHS) guidelines – General. Washington, DC: World Bank Group.
- International Labour Organization (ILO). (2018). Safety and health in construction. Geneva: ILO.
- Ministry of Information and Communication Technology (MICT), Somaliland. (2024). EA-RDIP project implementation manual. Hargeisa, Somaliland.
- Somaliland Ministry of Planning. (2019). State of the environment report. Government of Somaliland.
- United Nations Development Programme (UNDP). (2021). Gender-based violence and access to justice in Somaliland. Nairobi: UNDP.
- United States Geological Survey (USGS). (2014). SRTM global digital elevation model. USGS.
- World Bank. (2017). Environmental and social framework (ESF). Washington, DC: World Bank Group.
- World Bank. (2020). Good practice note on addressing sexual exploitation and abuse and sexual harassment (SEA/SH) in investment project financing. Washington, DC: World Bank Group.
- World Bank. (2020). Good practice note on stakeholder engagement. Washington, DC: World Bank Group.
- World Bank. (2020). Somalia country environmental analysis. Washington, DC: World Bank Group

14.3. ANNEX 1- ENVIRONMENTAL AND SOCIAL SCREENING MATRIX

<i>14.3.1.1. SUMMARY OF THE SCREENING PROCESS</i>			
E&S Screening		Results and Recommendations	
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Individual Risk/ Impact Rating	Mitigation At the end of the screen process, tabulate the mitigation measures in an ESMP Format (see below)
There is a new project in the vicinity of the sub-project that could contribute to cumulative impacts.	Cumulative impact	Low	Rehabilitation of worked out areas.
the activity includes a construction component	Safety		
the activity includes labour-intensive manufacturing	Safety risk due to the lack of OHS equipment's		
there a security risk for Sub-project Workers	Worker incidents	Low	
there a risk of delayed payment of workers	Delayed payment for skilled persons	Low	
there a risk that workers are underpaid	Foreign low skilled workers are underpaid	Low	
there a risk that women will not be	Gender inequality	Low	

included in deployment in equal numbers			
the activity result in the production of solid waste? (directly by the sub-project or by workforce)	Solid waste generation	Medium	
the activity result in the generation of dust and noise	Noise and dust generation	Medium	
the activity result in soil erosion	Soil erosion	Low	As provided by ESS3 • Where possible, avoid clearing of vegetation, particularly of indigenous vegetation colonies; • Ensure appropriate siting of infrastructure and confine excavation activities within the immediate sub-project site area, • Where clearing is done, compact loose soil on excavated areas, land should be landscaped and reclaimed by planting more trees and other vegetation; • Where erosion may occur due to vegetation loss, erosion control measures will be put in place like re-vegetation, stone bunds; • Vegetation clearing and topsoil disturbance will be minimized where possible; • Avoid moving heavy machineries and other equipment unnecessarily and away from designated transport routes; • Reclaim and re-vegetate the site once work is completed to reduce run-off • Contouring temporary and

			permanent access roads / lay-down areas to minimize surface water run-off and erosion ● Sheet and rill erosion of soil shall be prevented where necessary through the use of sandbags, diversion berms, culverts, or other physical means ● Topsoil shall be stockpiled separately from subsoil. Stockpiles shall not exceed 2 m height, shall be located away from drainage lines, shall be protected from rain and wind erosion, and shall not be contaminated. ● Wherever possible construction work will take place during the dry season. ● Topsoil shall be evenly spread across the cleared areas when reinstated. ● Accelerated erosion from storm events during construction shall be minimized through managing storm water run-off (e.g. velocity control measures). ● Soil backfilled into excavations shall be replaced in the order of removal in order to preserve the soil profile. ● Mulch generated from indigenous cleared vegetation shall be spread across exposed soils after construction
the activity result in increased levels of vibration from construction machinery	Vibration	Low	As provided by ESS4 and EHSG on Noise ● Siting noisy plant and equipment as far away as possible from classrooms and use of barriers (e.g. site huts, acoustic sheds or partitions) to reduce the level of construction noise at receptors wherever practicable; ● Construction workers should be aware of the sensitive nature of work places where they are operating in &

			advised to limit verbal / other form of noise; • Undertake regular maintenance of the construction equipment/ vehicles as per the operational manual • Where practicable noisy equipment will be orientated to face away from the nearest classroom and other receptors; • Working hours for significant noise generating construction work will be on daytime only and preferably during the school holidays • Alternatives to diesel and petrol engines and pneumatic units, such as hydraulic or electric-controlled units, will be used, where practicable; • Where practicable, stationary equipment will be located in an acoustically treated enclosure; • For machines with fitted enclosures, doors and door seals will be checked to ensure they are in good working order; also that the doors close properly against the seals; • Throttle settings will be reduced and equipment and plant turned off, when not being used; • Equipment will be regularly inspected and maintained to ensure it is in good working order. The condition of mufflers will also be checked; and fitting of mufflers or silencers of the type recommended by manufacturers.
Will the sub-project produce air pollution? (e.g. significant greenhouse gas)	Air pollution	Low	As provided by ESS4 • Develop and implement a Dust Management Plan (DMP) and Undertake

emissions, dust emissions and other sources)			inspections to ensure compliance with the Dust Management Plan; • Contractors to use dust screens/nets as necessary when dusty construction activities are occurring; • Provide appropriate PPE (dust masks) to workers & enforce use; • Record all dust and air quality complaints, identify cause(s), take appropriate action; • Undertake monitoring close to dusty activities, noting that this may be daily visual inspections, or passive/active monitoring as parameter • Remove dusty materials form site as soon as possible if not being re-used. If being re-used, cover or vegetate if possible; • Impose speed limits on haul routes and in construction compounds to reduce dust generation; • Construction trucks delivering materials to site should be covered with tarpaulins in order to minimize spread of dust/fugitive emissions to the surrounding areas and prohibit unnecessary idling of construction related vehicles • Undertake watering to attenuate dust near sensitive receptors. The duration and frequency of this should be set out in the Dust Management Plan and will consider water availability and any stakeholder grievances; and • Re-vegetate exposed areas as soon as feasible; • Re-vegetate or cover stockpiles if feasible;
---	--	--	--

			● Expose the minimum area required for the works, and undertake; and exposure on a staged basis to minimise dust blow.
the activity disturbs any fauna and flora	Biodiversity disturbance	Low	As provided by ESS6 ● Ensure proper demarcation and delineation of the sub-project area to be affected by construction works; ● Where possible, avoid clearing the vegetation; ● It is recommended that indigenous trees or other fast-growing trees be planted in strategic locations where the vegetation cover will be cleared as part of landscaping initiatives; ● Identify and restrict movement of vehicles to areas of disturbance. ● Compensatory planting of trees i.e. plants at least twice the number of trees ● Staged vegetation clearance is also recommended so as not to clear the entire corridor all at once. ● The use of existing cleared or disturbed areas for the Contractor's Camp and compliance to the provisions of Workers' accommodation processes and standards GUIDANCE NOTE of IFC and European Bank and discussed in Table 6.1 above shall be encouraged. ● Whenever possible, all damaged areas shall be reinstated and rehabilitated upon completion of the contract to as near pre-construction conditions as possible. ● Reinstatement of temporary construction sites, spoil dumping areas should be done as swiftly as possible and always with suitable native grasses and

			other plants Where the subproject ESIA or ESMP identifies possible impacts on endangered or otherwise protected plant species, a mitigation measure would be to have a qualified botanist survey locations in advance of clearing. Also, impact on fauna due to habitat destruction and poaching by workers.
the activity includes payments or cash transfers	Inequitable distribution, corruption, misuse,	Low	
the activity expose community members to physical hazards on the sub-project site	Physical hazards	Low	As provided by ESS2 - The sub-project will develop an OHS Plan with measures that aim at avoidance and reducing or minimizing the application of the “Hierarchy of Controls” according to OHS principles Elimination, substitutions, administrative controls. - Provide adequate and appropriate PPEs for the workers operating the infrastructure once commissioned - Carry out risk assessment and OHS Inspection on a regular basis - Only trained workers will be allowed to install, maintain and repair equipment - SMPs will contain emergency preparedness and response measures. - Availability and access to first-aid equipment and medical supplies. - CoC should also enforce the Contractors should implement an OHS Plan (OHS).

the activity poses traffic and road safety hazards	Traffic and road safety hazards	Low	Rehabilitation of worked out areas.
the activity includes debris removal that may pose a safety hazard for the community	Debris removal	Low	
There is a new sub-project in the vicinity of the sub-project that could contribute to cumulative impacts.	Cumulative activity	Medium	

14.4. ANNEX 2 -CULTURAL AND CHANCE FIND PROCEDURES:

This procedure was developed in accordance with the World Bank's ESS 8 (to protect cultural heritage from the impacts of sub-project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, to promote meaningful consultation with stakeholders regarding cultural heritage. To promote the equitable sharing of benefits from the cultural heritage).

This procedure is included as a standard provision in the implementation of civil activities under EA-RDIP contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). All implementers / contractors will be required to observe this procedure as documented hereafter.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the PIU and the World Bank in order to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied.

- *Stop construction activities;*
- *Delineate the discovered site area;*
- *Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the responsible authority takes over;*

- *Notify the responsible foreman/archaeologist, who in turn should notify the PIU and the World Bank and local authorities (within less than 24 hours);*
- *The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values;*
- *Decision on how to handle the finding will be reached based on the above assessment and could include changes in the sub-project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage;*
- *Implementation of the decision concerning the management of the finding;*
- *Construction work can resume only when permission is given from the respective authorities, PIU and World Bank after the decision concerning the safeguard of the heritage is fully executed;*
- *In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archaeological findings works and protections.*

14.5. ANNEX 3 - CONTRACTORS ENVIRONMENTAL AND SOCIAL AND MANAGEMENT PLAN (C-ESMP) CONTENTS

a) Sub-project Background Information	q) Noise and Vibration Management Plan
b) General Information	r) Hazardous Prevention and Control Plan
c) Contractors Environment, Social , Health and safety Policies	s) Solid and liquid Waste Management Plan
d) Licenses and Permits to be acquired	t) Health and Safety Management Plan
e) Personal Protective Equipment/welfare requirements	u) Gender Based Violence, Sexual Exploitation Prevention and Response Plan
f) Scope of ESMP and HSMP	v) Program Induced Labor Influx
g) Objectives of the ESMP and HSMP	w) Workers Accommodation Plan
h) Sub-project Description and Baseline Information	x) COVID-19, HIV/AIDS and Drug Abuse Prevention
i) Site and Work Activities	y) Security Plans
j) Analysis of Legal Provisions	z) Employees and Employers Code of Conduct
k) Resource Roles and Responsibilities of	aa) Logistic Risks Management Plan

<i>Workforce on site</i> <i>l) Competence and awareness training</i> <i>m) Standard Operating Procedures</i> <i>n) Stakeholder engagement and Grievance Management</i> <i>o) Environment, Social Health and Safety Management Plan for Specific site activities</i> <i>p) Environment Social Health and Safety Monitoring Plan</i>	<i>bb) Grievance Redress Mechanism</i> <i>cc) Traffic Management Plan</i> <i>dd) Emergency Preparedness and Response Plan</i> <i>ee) Material Borrow pits/Quarry Management Plan</i> <i>ff) Biodiversity Management Plan</i> <i>Gg) Erosion and Sediment Control Plan</i>
--	---

14.6. ANNEX 4 - LAND OWNERSHIP



Xafiiska Wasiirka / Minister Office

Ref: MICT/MO-01/ 258 /2025

Date: 20/12/2025

To: Whom It May Concern

Cc: Ministry of Public Works, Land and Housing

Cc: Director General, Ministry of Information and Communication Technology

Cc: Vice Minister, Ministry of Information and Communication Technology

Subject: Official Confirmation of Land Ownership of the Ministry of Information and Communication Technology of Somaliland

This letter serves to formally confirm to the relevant authorities that the premises currently occupied by the Ministry of Information and Communication Technology of the Republic of Somaliland located in the 26 June District are the lawful property of the Ministry of Information and Communication Technology.

The size and layout of the said premises are illustrated in the image attached below with further details presented in Table 1.

Table 1: project site location

Site Name	Latitude	Longitude
MICT premises	9°33'37.24"N	44° 3'25.53"E



Wasaaradda Isgaadhsiinta iyo
Tiknoolajiyadda JSL



Ministry of Information and
Communication Technology

Xafiiska Wasiirka / Minister Office



Regards,

Hon. Mr. Jamal Mohamed Jama
Minister of MICT, Republic of Somaliland



mict.govsomaliland.org

twitter.com/MICTSOMALILAND
 facebook.com/SLMOCT

instagram.com/mictsomaliland
 bit.ly/3HvKglk

[illegible]

Key Discussions:

Information presented	The EA-RDIP PIU Safeguard team presented: - project purpose, reconstruction need, and benefits. - temporary impacts (noise, dust) and control measures. - Shared safety protocols and access	
-----------------------	---	--

	controls. - Explained expected traffic from heavy vehicles. - Shared approach for Traffic Management Plan. - Presented compound access adjustments. - Shared safety expectations and fencing plan. - Explained construction noise and dust management. - Confirmed work mainly during daytime hours only. Shared the project timeline (6–8 months). - Presented demolition and rebuilding process. - Emphasized consistent communication and GRM channels. Presented new building features (modern offices, accessibility, improved safety, women’s prayer room). - Explained temporary relocation process. Presented key briefing points including: • Safety & access plan (fencing, alternate routes, traffic marshals). • Worker behavior policy and Code of Conduct. • GBV/SEAH zero tolerance policy. • Confidential GRM for reporting concerns. • Expected changes during construction (vehicles, demolition,	
--	---	--

	dust). • Construction duration (6–8 months).	
Stakeholder Feedback and PIU response		
Stakeholder	Feedback	PIU Response
Mosque	Requested high-standard implementation. - Appreciated early notification. - Need clear boundary demarcation. - Noise impact during prayer times. - Close the mosque door facing MICT to reduce noise/dust. - Requested the women's mosque section to be on mosque side. - Requested installation of CCTV for security.	Demarcate boundary before construction. - Adjust noisy activities to avoid prayer times. - Temporarily close the mosque-facing door. - Manage dust and noise. - Install CCTV around the site.
ICRC (International Committee of the Red Cross)	- Welcome to the project. - Concern about traffic congestion from material transport. - Need traffic mitigation measures.	Develop and implement a Traffic Management Plan. - Coordinate delivery schedules to reduce congestion. - Maintain communication with IRC
TEC	Will collaborate on traffic management. - Offer access to their garage to minimize congestion. - Recommended including electrical and general safety measures in design.	during construction. Use the TECH garage route where feasible. - Integrate safety measures in design and ESMP. - Joint traffic coordination meetings
Silanyo National Library	Welcome to the initiative. - Concern about noise impacts during library working hours.	Restrict high-noise work during peak library hours. - Provide early notifications

		of any high-noise activities. - Ensure OHS standards in building design and construction. - Adopt sound management practices for worker safety and comfort.
Data Center (Taiwan)	- Highlighted importance of stakeholder notification. - Ongoing construction nearby. - Welcome collaboration to manage cumulative adverse impacts.	Maintain continuous engagement. - Coordinate construction activities with ICDF's ongoing works.
Ministry of Health (MoH)	- Emphasized the need for a high-standard working environment for staff.	Ensure OHS compliance. - Provide safe temporary working spaces. - Ensure minimal disruption to MoH staff movement.
Action points	• Maintain regular communication with all stakeholders • Clearly demarcate the boundary between the mosque and the PIU construction site. • For the identified but mitigation measures in place. • Finalize and communicate temporary relocation arrangements for departments affected by construction • Coordinate activities with Taiwan/ICDF construction works to avoid overlapping disturbances.	

14.9. ANNEX 7 - BUILDING SCHEME

