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MINISTRY OF INFORMATION AND COMMUNICATION TECHNOLOGY (MICT)

EASTERN AFRICA REGIONAL DIGITAL INTEGRATION PROJECT (EA-RDIP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

April 2026

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ABBREVIATIONS & ACRONYMS

AWPB	Annual Work Plan and Budget
CBS	Central Bank of Somaliland
CMM	Cybersecurity Maturity Model
CIG	Common Interest Group
CERT	Computer Emergency Response Team
CII	Critical Information Infrastructure
CITES	Convention on International Trade against Endangered Species
CEDAW	Convention on the Elimination of All forms of Discrimination against Women
CHSMP	Community Health and Safety Management Plan
CoCs	Code of Conduct
DPA	Data Protection Authority
DoE	Directorate of the Environment
DSA	Detailed Site Assessment
DMP	Dust Management Plan
EAC	East African Community
EHS	Environment Health and Safety
EEE	Electrical and Electronic Equipment and generated
EA-RDIP	East Africa Regional Digital Integration Project
ESCP	Environment and Social Commitment Plan
EWARN	Early Warning and Response Network
ESF	Environmental and Social Framework
ESSs	Environmental and Social Standards
ESIA	Environmental and Social Impact Assessments
ESMP	Environmental and Social Management Plans
FGDs	Focused Group Discussions
GoSL	Government of Somaliland
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
GEA	Government Enterprise Architecture
GCF	Green Climate Fund
GIIP	Good International Industry Practice
IP	Implementing Parties
IDP	Internally Displaced Persons
IEC	Information Education and Communication
ICR	Implementation Completion Report
IGAD	Intergovernmental Authority on Development
INDC	Intended Nationally Determined Contribution
IUCN	International Union for Conservation of Nature
IPPF	Indigenous Peoples Policy Framework
LMP	Labor Management Procedures
MICT	Ministry of Information Communication and Technology
MG& IP	Vulnerable and Marginalized Groups and Indigenous People
MoF	Ministry of Finance

MoECC	Ministry of Environment and Climate Change
MoTT	Ministry of Commerce and Investment
MoPWLH	Ministry of Public Works, Land & Reconstruction
MoIID	Ministry of Investment and industry Development
MoI	Ministry of Interior
ALGASL	Association of Local Government Authorities of Somaliland
MoTD	Ministry of Transportation and Roads
NADFOR	National Disaster Preparedness and Food Reserve Authority
NDRA	National Displacement and Refugee Agency
NFOC	National Fiber Optic Company
NPSCs	National Project Steering Committees
OHSMP	occupation Health and Safety Management Plan
OPGW	Optical Ground wire
PAD	Project Appraisal Document
PDO	Project Development Objectives
PIM	Project Implementation Manual
PIU's	Project Implementation Unit
PLWD	Persons Living With Disabilities
PPE	Personal Protective Equipment
PSEA	Project Sexual Exploitation and Abuse
RAN	Radio Access Network
REC	Regional Economic Communities
RPF	Resettlement Policy Framework
SDAC	Sustainable Development Advisory Committee
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SHE	Safety Health and Environment
SEMA	Somaliland Environment and Management Authority
SCALED	Somalia Capacity Advancement, Livelihoods and Entrepreneurship, through Digital Uplift Project
SH	Sexual Harassment
SOP	Series of Projects
SMF	Security Management Framework
TPMA	Third Party Monitoring Agents
TVET	Technical and Vocational Education and Training
UNFCCC	UN Framework Convention on Climate Change
UNICEF	United Nations International Children Emergency Fund
UNHCR	United Nations High Commissioner for Refugees
VAC	Violence against Children
WASH	Water Sanitation and Hygiene
WEEE	Waste Electrical and Electronic Equipment
WHO	World Health Organization
WTO	World Trade Organization

EXECUTIVE SUMMARY

PROJECT INFORMATION

Somaliland, with a total population of about 5 million in 2021 and one of the highest rates of urbanization in Africa, has long sought to make advances in the digital economy.

Somaliland's population is young and has become more urbanized over time due to several factors, including repeated droughts. The different population groups stand at 53 percent urban dwellers, 11 percent residents in rural settlements, and 34 percent nomadic and agro-pastoral communities. Meanwhile, two percent of the population lives in settlements for Internally Displaced People (based on government and UN estimates)..

According to NDP III (2023-2027**), GDP** per capita increased from US$557 to US$775. Compared to initial estimates in 2012, this is a jump from the fourth poorest country in the world to the eighteenth poorest in the world [1]. The World Bank estimated GDP per capita for 2021 was 446 US dollars. This translates into well below the international poverty line of 1.90 US dollars a day and the target for SDG1: eradicate extreme poverty. Through East Africa Regional Digital Integration Project (EA-RDIP), Somaliland will benefit from USD 13 million to support a series of projects towards regional connectivity markets, regional data markets, and regional online and digital markets. The Project Components are summarized in **Table E.1** below.

Table E.1: Project Components

Component	Sub-component	Description
Component 1: Connectivity market development and integration	Sub-component 1.1: Cross-border and backbone network connectivity	This subcomponent will support the deployment of key missing cross-border and backbone fiber links to improve the resilience, coverage, and integration of regional and national connectivity networks. It will support the deployment of up to 865 km of new fiber along prioritized backbone network routes, including connecting Berbera main cable landing station to major population centers, as well as establishing new cross-border links to Somalia and Ethiopia. The fiber is likely to be deployed in phases, starting in the Berbera – Hargeisa route, where is identified as the main priority route one. Gap financing will be provided for the deployment of related routes, using a range of modalities to crowd in private sector financing. Commercial providers are expected to co-finance, design, build, and operate network infrastructure deployed on an open access basis and at reasonable rates to support affordable service expansion and competition.
	Sub-component 1.2: Last mile connectivity including in borderland areas	This sub-component will be providing catalytic funding to unlock further infrastructure deployment in unserved or underserved areas, which are highly correlated with higher poverty levels and climate vulnerability (including in refugee/IDP camps and their host communities, located in rural and borderland areas) and to connect public institutions along fiber route. Infrastructure financed will be deployed using a range of modalities, including reverse auctions, bulk purchase

[1] https://www.refworld.org/policy/strategy/natlegbod/2023/en/124333

		of capacity81 and/or licensing arrangements, that aim to maximize private sector financing.
	Sub-component 1.3: Enabling legal, regulatory and institutional ICT environment	This subcomponent will strengthen existing ICT frameworks and boost regulatory maturity to effectively spearhead the connectivity agenda and universal services targets through the development of new strategic, policy, and regulatory instruments.
Component 2: Data market development and integration	Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity	This sub-component will strengthen local capacity to effectively detect, respond to and mitigate evolving cyber threats and cybercrimes as well as support implementation of forthcoming cybersecurity legal and strategic frameworks.
	Sub-component 2.2: Data exchange, governance and protection	This subcomponent will support investments in enabling data infrastructure and governance frameworks that facilitate cost-effective and secure data storage, processing and sharing.
Component 3: E-service market development and integration	Sub-component 3.1: Digital cross-border trade, payment and service enablers.	This subcomponent aims to enhance readiness to expand digitally enabled cross-border trade and service delivery, by introducing key enablers.
	Sub-component 3.2: Regional research and education networks (RENs), and training digital skills.	This subcomponent will support the development of the digital skills base through support for SomaliREN, and new digital skills training programs.
Component 4: Project Management and Implementation Support	n/a	This component will finance key project management functions, including procurement, FM, M&E, communications as well as ESF compliance, with a particular emphasis on addressing the high security- and GBV-related risks associated with the deployment of infrastructure and civil works, including. It will finance the establishment and operations of (i) the main Project implementation Unit (PIU) at MICT, and (iii) coordination with the regional PIU at IGAD level.

EMSF FRAMEWORK

The project will be screened for environmental and social risks using the World Bank's Environmental and Social Framework (ESF). The ESF consists of a Vision for Sustainable Development,[2] ten Environmental and Social Standards (ESSs),[3] which set out the requirements that apply to the Government of Somaliland,

[2] See https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=15&zoom=80

[3] https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards

an Environmental and Social Policy for Investment Project Financing (IPF),[4] which sets out the requirements that apply to the Bank, and an Environmental and Social Directive for IPF[5] and a Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups.[6] The Framework applies to all IPF projects initiated on or after October 1, 2018.

The objective of this Environmental and Social Management Framework (ESMF) is to assist in identifying the type of environmental and social assessment that should be undertaken, including through clarifying the procedures for screening of environmental and social risks. In this context, the ESMF examines the risks and impacts when a project's risks and impacts cannot be fully determined until the program or subproject details have been identified. This ESMF ensures that the project activities scheduled for implementation are compliant with the relevant requirements of national, policies, regulations, and legislation (construction and operation standards) as well as the World Bank's Environmental and Social Framework (ESF), including the Environment and Social Standards (ESSs).

The ESMF identifies potential risks and impacts and mitigation measures as per ESF, including: (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (ii) risks that project impacts fall disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable; (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be disadvantaged or vulnerable; (iv) impacts on the health, safety and well-being of workers and project-affected communities. The ESMF also includes standalone sub plans including; a) e-waste management, b) SEA/SH/GBV risk assessment and prevention, c) Resettlement Policy Framework (RPF), and d) Labor Management Procedures (LMP).

ESMF METHODOLOGY

This ESMF was prepared in accordance with standard procedures for environmental and social assessment including World Bank Environmental and Social Standards (ESSs), other relevant international environmental and social assessment regulations and guidelines, and the Somaliland environmental assessment guidelines. This entailed literature review including (i) Project Appraisal Document (PAD) and (ii) ESMF of other projects such as the Somaliland Electricity Sector Recovery Project (SESRP) Somali Crisis Recovery Project (SCRP) and stakeholder discussions and Security Management Plans for SCRP Consultations were conducted, as highlighted in **Tables 9.2 to 9.9** presented under chapter 9 of this report.

ENVIRONMENT AND SOCIAL IMPACTS

Environmental Risks: The implementation of project activities under EA-RDIP Component 1: Connectivity market development and integration, Component 2: Data market development and integration and Component 3: E-service market development and integration may potentially cause environmental impacts including the alteration of terrestrial and aquatic habitats in Somaliland. This can have adverse

[4] https://thedocs.worldbank.org/en/doc/360141554756701078-0290022019/original/WorldBankEnvironmentalandSocialPolicyforInvestmentProjectFinancing.pdf
[5] https://ppfdocuments.azureedge.net/52955d77-eaea-40fa-9e42-299529933719.pdf
[6] https://policies.worldbank.org/en/policies/all/ppfdetail/9598117e-421d-406f-b065-d3dfc89c2d78

impacts especially if linear digital infrastructure passes through critical habitats or biodiversity hotspots[7] during construction periods and possibly during maintenance. The installation of fixed line components, including shore approaches for long distance fiber optic cables, and access roads to transmission towers and other fixed infrastructure, may require construction of corridors crossing aquatic and terrestrial habitats with the potential to disrupt watercourses, wetlands, coral reefs, and riparian vegetation. Construction and electronic wastes may be generated from general construction activities and installations, contributing to increased waste loads in a country with no infrastructure for waste management. Construction activities may also account for an increased demand for resources including water, energy and raw materials, contributing to resource depletion, pollution and other impacts deleterious to ecosystems. In addition, there is a likelihood of occurrence of occupational health and safety issues facing workers and community installing the fiber and last mile connectivity cables.

Social Risks include Acquisition of land and potentially physical and/or economic resettlement which may differentially affect vulnerable groups ESS7 communities, those with smaller land plots or informal rights to land use due to deployment of digital infrastructure**.** Construction of infrastructure resulting in labour influx which may impact community health and safety including transmission of diseases (including STIs and Covid-19), conflict between workers and the community as well as risks associated with sexual exploitation and abuse and sexual harassment (SEA/SH) among project workers and between project workers and local communities, risks related to use of security personnel on work sites, including in relation to SEA/SH as well as related potential abuses involving exacerbating community conflicts, and specific risks to the labour force including lack of adequate, accessible worker grievance mechanism, occupational health and safety issues, and use of child and/or forced/trafficked labour by contractors or in the supply chain.

E-wastes: The infrastructure installed under the EA-RDIP for Somaliland will be operated and marinated by the Ministry of Information Communication and Technology (MICT). Apart from regular operation and maintenance, several issues would require special attention for reducing/avoiding possible adverse environmental impacts. The main component of adverse risks will be from IT apparatus which generate e-wastes upon malfunctioning, e- wastes have been known to affect people's health due to lead and mercury poisoning and other heavy metals, halogenated Compounds and Radioactive Substances. **Key Mitigation measures for the risks are provided in detail in the ESMF.**

IDENTIFICATION OF ENVIRONMENTAL AND SOCIAL RISKS

Consistent with the requirements of ESS1, the PIUs at MICT in Somaliland will carry out environmental and social assessments of the program/activities to assess the environmental and social risks and impacts. The assessments to be carried shall be proportionate to the potential risks and impacts of the project and its subprojects, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts throughout the project life cycle, including those specifically identified in ESSs 2–10. The environmental and social risks screening will occur during the sub-project preparation stage as a soon as the fairly accurate site location(s) is (are) known for the sub-project(s) using the screening

[7] Therefore, to avoid this risks annex 1 provides an exclusion list whereby if a critical habitat or any other parameters discussed in the exclusion list are found, then re-routing will be done

checklist, outcome of screening will inform specific environment and social safeguards assessment and management plans that will be required.

In carrying out the ESIA or ESMP and RAPs, supporting evidence of comprehensive public consultation shall be required, such as signed minutes of consultation meetings, attendance lists and filled questionnaires. Public consultations shall take place during the environmental and social screening process and during the validation of the ESIA and RAP report. The results of public consultation shall be incorporated and or influence the design of mitigation and monitoring measures. ESIA study reports for the subproject shall be disclosed in-country by the client (MICT) in formats that are accessible to all project stakeholders and on the World Bank external website. Public consultations should be conducted in a manner accessible to all project stakeholders, and considering the guidance set out in the project Stakeholder Engagement Plan and any other relevant guidance

IMPLEMENTATION ARRANGEMENTS

A dedicated PIU is established and maintained within MICT, which will serve as the main implementing agency in Somaliland. The established PIU within the MICT. The PIU includes a Project Coordinator, one FM Specialist, one Procurement Specialist, one M&E Specialist, one Environment Specialists, one Social Specialist, one GBV specialist, one Communication specialist, Security specialist and Technical Specialists with subject matter expertise in areas such as connectivity infrastructure and Technical Advisor.

CAPACITY DEVELOPMENT FOR ESMF

This component will 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 and social safeguards management. Specifically, this component will consist of (a) operating and staff costs of the PIU, including the recruitment of expert consultants in key areas; (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 and Training on Environment and Social Safeguards provisions.

RESOURCE AND BUDGET

The ESMF provides a consolidated budget estimate for the implementation of overall Environmental and Social Management Framework instruments. The budget components include implementing agency environmental and social risk management and associated capacity development activities; a training program for all relevant entities to implement their E&S responsibilities. Resettlement Policy Framework, Security Management Framework (SMF), Updated Stakeholder Engagement Plan, Labor Management Plan (LMP), and SEA/SH/GBV Action Plan, subproject ESIAs, ESMPs, RAPs, etc.; and annual reviews, below, presents a provisional estimate of the budget needed to implement the ESMF.

GRIEVANCE REDRESS MECHANISM

The World Bank ESSs require that Bank-supported projects facilitate mechanisms that address concerns and grievances that arise in connection with a project and including a separate grievance mechanism for project workers to raise workplace concerns, including workplace sexual harassment, in line with the provisions of ESS2. This worker grievance mechanism is outlined in the project GRM Manual. One of the key objectives of ESS10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances. The Project GRM will facilitate the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The EA-RDIP will provide mechanisms to receive and facilitate resolutions to such concerns as detailed in chapter 8 of this ESMF.

STAKEHOLDER ENGAGEMENT

A Stakeholder Engagement Process was developed to achieve effective stakeholder identification and mapping. The process is further detailed in the stand-alone SEP. The objectives focused on obtaining the views of relevant stakeholders on subject matter relating to proposed activities, through engaging in effective, inclusive, culturally sensitive, participatory consultation and informed information disclosure.

As part of SEP development stakeholder consultations were held with Key Department and Government Agencies (MDAs) at Somaliland level targeting Ministry of Trade and Tourism, Private sector with telecoms operators, and Education sector with Somaliland Research and Education Networks (Somali-REN).

1 INTRODUCTION

1.1 Background Information

The Government of Somaliland is faced with the absence of an integrated fiber optic backbone network that has rendered more than 70 percent[8] of the population without access to broadband services. Further, Adoption of broadband services remains low in Somaliland compared to regional peers. Mobile broadband penetration is estimated to be 15.4 percent.[9] Important gaps in the value chain impact the quality of service, resulting in low speeds and high call drop rates. The fragmented market lack of interconnection between operators is limiting network deployment outside of the major urban areas. Data management and hosting is currently highly fragmented across Somaliland, and institutional and governance mechanisms for data protection remain limited in operation.

Somaliland's Cybersecurity ecosystem is in 'start up' stage requiring support on operationalization. The Critical Information Infrastructure (CII) and Cybersecurity Maturity Model (CMM) diagnostics, carried out with WB support, suggest that Somaliland is still in the 'start-up' stage of developing its cybersecurity ecosystem. A national strategy, policy or institutional, and governance structure for cybersecurity is being developed. Somaliland plans to introduce a national Computer Emergency Response Team (CERT) – Security Operations Center (SOC), which will require continued support.

Somaliland is yet to fully tap into the regional market on account of limited trade agreements, and lack of digital service enablers. Integration with a larger market is limited on account of limited trade agreements (e.g., limited accession to the World Trade Organization (WTO) frameworks in the telecom sector), absence of e-commerce strategy. While an e-Government strategy is being developed as well as a Government Enterprise Architecture (GEA), a shared technical solution for interoperability is needed that can connect to different systems and allow them to seamlessly exchange data. Only a handful of G2B and G2P services have been deployed, including visa processing, business registration, and digital payments.

There is room to bolster capacity of the SomaliREN to expand coverage to higher educational institutions and through collaboration with more mature (National Research and Education Network (NRENs) in the region (e.g. Kenya -KENET, Ethopia-EthERnet, others). Somaliland plans to establish the National ICT Institute (NICTI) planned to aim for tasks related to digital training for the public sector.

Through East Africa Regional Digital Integration Project (EA-RDIP), the Government of Somaliland will benefit from USD 13.5 million to support Series of Projects towards Regional connectivity market, regional data market, and Regional online and digital market.

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[8] World Bank," Somalia Digital Economy Diagnostic," World Bank, Washington, DC (2022).

[9] GSMA Intelligence, 2022.

1.2 Project Development Objective (PDO)

The SOP Development Objective is to promote the establishment of an integrated digital market across the Eastern Africa region by increasing the cross-border flow of broadband, data traffic, and digital services.
The Project Development Objective (PDO) of SOP-I is to advance regional digital market integration through increasing access to broadband connectivity and strengthening the enabling environment for digital service delivery.

1.3 Project Components

1.3.1 *Component 1: Connectivity market development and integration*

Sub-component 1.1: Cross-border and backbone network connectivity: The sub-component aims to support the deployment of up to 865 km of new fiber along prioritized routes[10] 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.

Subsidies will be provided for the deployment of new fiber networks, where needed and awarded to selected providers who will be expected to co-finance, design, build,[11] and operate network infrastructure deployment on an open access basis at reasonable rates.

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.

1.3.2 *Component 2: Data market development and integration*

[10] The pre-study looked at the ideal backbone network configuration for Somaliland, which considered (i) projected demand, ensuring that the maximum number of population centers are connected; (ii) opportunities for parallel deployment with other linear infrastructures, including planned energy transmission and road networks; (iii) planned deployment that is already commercially viable from a private sector standpoint; (iv) strategic cross-border links that would help integrate regional backbone networks; (v) related investments in submarine cable that could complement a terrestrial cable, such as via a festoon cable; (vi) a realistic assessment of the security context; and (vii) suitable technology solutions.

[11] Construction is expected to be led by the private sector covering passive (for example, ducts) and active infrastructure (fiber cores), with rights of way, and dig-once obligations.

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).

1.3.3 *Component 3: E-service market development and integration*

Sub-component 3.1: Digital cross-border trade, payment and service enablers: To support the creation of the 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.

1.3.4 *Component 4: Project Management and Implementation Support*

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 and social 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 1.1** below provided Priority fiber optic links proposed in Somaliland.

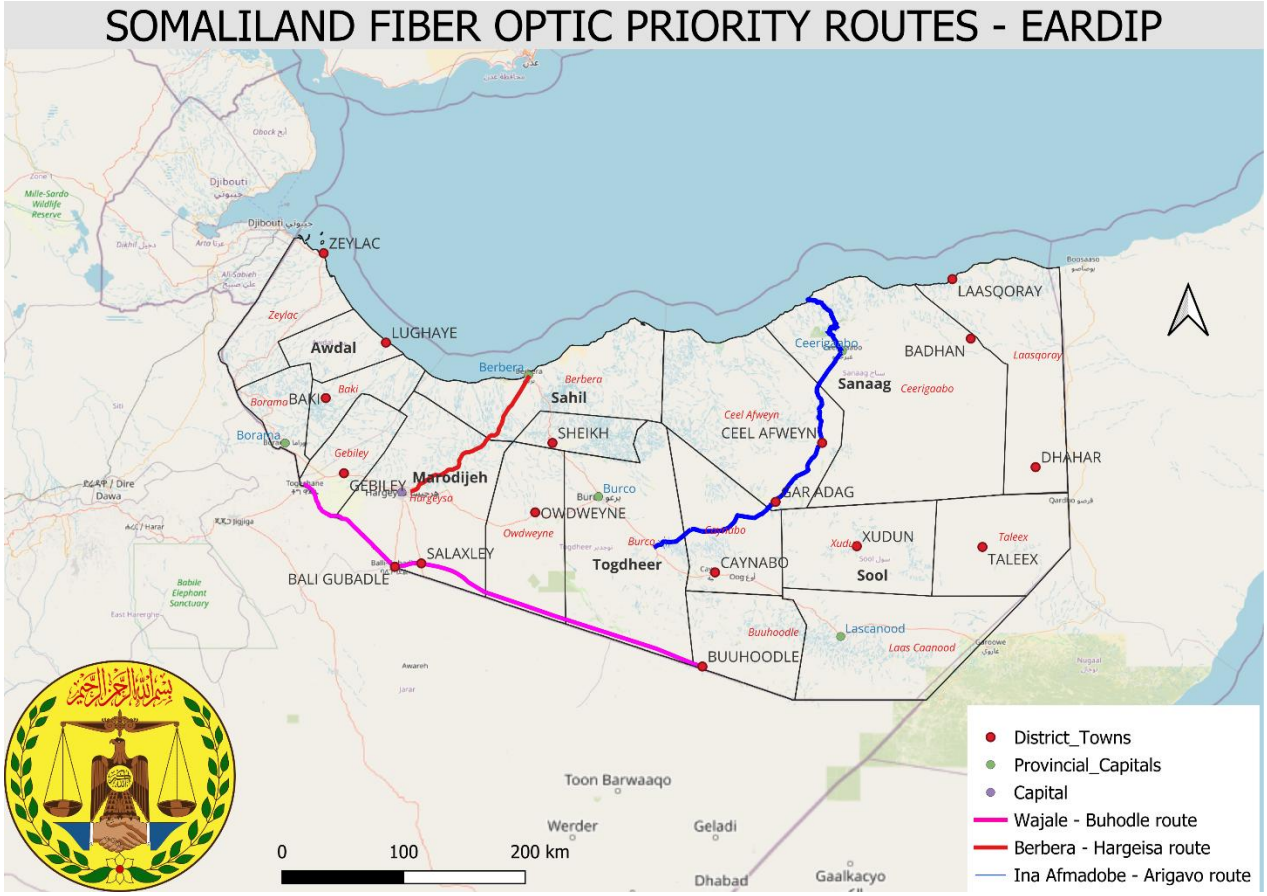

Figure 1-1: Priority fiber optic links, Somaliland

1.4 Project Implementation Arrangements

Regional Economic Communities (REC) activities will be implemented through two regional PIUs – at the Planning Directorate under the EAC and at the Trade Department under IGAD. The regional PIUs will be responsible for overall implementation and coordination of project activities at regional level. At EAC, project implementation will leverage the procedures and structures, expanded as needed, of an existing PIU within the EAC Secretariat previously established under the *Eastern Africa Regional Statistics Program for Results* (P176371). At IGAD, project implementation will also leverage an existing PIU within the Trade Department – likely the PIU established under the *Food Systems Resilience Programme for Eastern and Southern Africa* (P178566). This will allow the project to leverage existing implementation capacity, including familiarity of World Bank processes.

In Somaliland, a dedicated PIU will be established and maintained within MICT, which will serve as the main implementing agency in Somaliland. A PIU will be established within the MICT, which has a prior track-record of World Bank project implementation under the two phases of the *ICT Sector Support in Somaliland Project* (P148588), which were completed with a "*Satisfactory*" rating. The PIU will include a Project Coordinator, one FM Specialist, one Procurement Specialist, one M&E Specialist, one Environment Specialists, one Social Specialist, one GBV specialist, one Communication specialist, one Security specialist

and two Technical Specialists in areas connectivity infrastructure and technical advisor. **Table 1-1** below provides details of implementation arrangements

Table 1-1: National Level Implementation Arrangements

	SOMALILAND	
PIU	**New PIU at MICT:** MICT has a prior track-record of World Bank and other international project implementations	
	Members: Recruitment or appointment of one Project Coordinator, FM Specialist[12], Procurement Specialist, M&E Specialist, Environment Specialist, Social Specialist, Security Advisor, one Gender Based Violence/Gender Specialist and Technical Specialists with subject matter expertise in areas connectivity infrastructure, and technical advisor. All the PIU members except the security specialist will be hired by effectiveness. Other roles are expected to be hired no later than three months after effectiveness.	
	Responsibilities: The PIU will be primarily responsible for project implementation, including overseeing core project-related fiduciary functions, M&E and E&S commitments. It will also act as the single point of contact for the regional PIU at IGAD and EAC to facilitate collaboration on designing and implementing specific activities. The PIU will submit project reporting to a PSC as well as to the World Bank and engage with the TC(s) on specific matters requiring technical expertise/input on an ad-hoc basis. The detailed composition and role of the PIU will be set forth in the individual country PIMs[13].	
PSC	**Chair:** Minister, MICT **Vice-Chair:** Director General, MICT **Secretary:** PIU Project Coordinator **Members:** Representatives from MICT, , Ministry of Finance (MoF) and the regional PIU at IGAD and EACas needed basis.	**Chair:** Deputy Minister of MICT&PS **Vice-Chair:** Undersecretary, MICT&PS **Secretary:** PIU Project Coordinator **Members:** Representatives from MICT&PS, Ministry of Finance, Ministry of Planning and National Development, Ministry of Transportation and Roads, Ministry of Public Works, Land and Housing, Commission of Higher Education, and Ministry of Trade and Tourism regional PIU at IGAD and EAC
	Responsibilities: (a) approval of the AWPB; (b) biannual review of project progress; (c) review of procurement evaluations and approval; and (d) provision of strategic guidance and recommendations to the PIU and the TC(s) related to project implementation. The Terms of Reference (ToR) for the PSC, including the required participants for quorum, will be detailed further in the national PIMs, to be prepared before effectiveness.	
TCs	**Members:** Ministry of Information and communication Technology (MICT), Ministry of Education (MoE), Ministry of Interior (MoI), Ministry of Public Works, Land and Housing (MoPWLH), Ministry of Trade and Tourism (MoTT), Ministry	**Members:** Representatives from MICT&PS, NCA, International Gateway, USAF, Ministry of Finance and Planning, Ministry of Roads and Bridges, Ministry of Transportation, Ministry of Higher Education, and Ministry of Trade and Industry as

[12] In Somaliland, this may be a seconded Accountant from the Office of the Accountant General, rather than external recruitment of FM Specialist.

[13] These are expected to be prepared before project effectiveness.

	of Investment and Industrial Development (MoIID), ALGASL, Ministry of Environment and Climate Change (MOECC), National Fiber Optic Company (NFOC), MoTT,	well as members of the regional PIU at IGAD and EAC
	Responsibilities: TCs will convene participation from the private sector and civil society as well as from relevant agencies deemed key to facilitating successful implementation and stakeholder management to support any technical-level decisions that require broader agreement, resolve operational issues or facilitate M&E and supervision. The PIU will interact with TC(s) on an *ad-hoc* basis, and the TC(s) will report to the PSC. The ToRs for the TC(s), some of which may have only a short duration, as dictated by project implementation timelines, will be detailed further in the country level PIMs.	

Figure 1-2 below provides implementation arrangement diagram

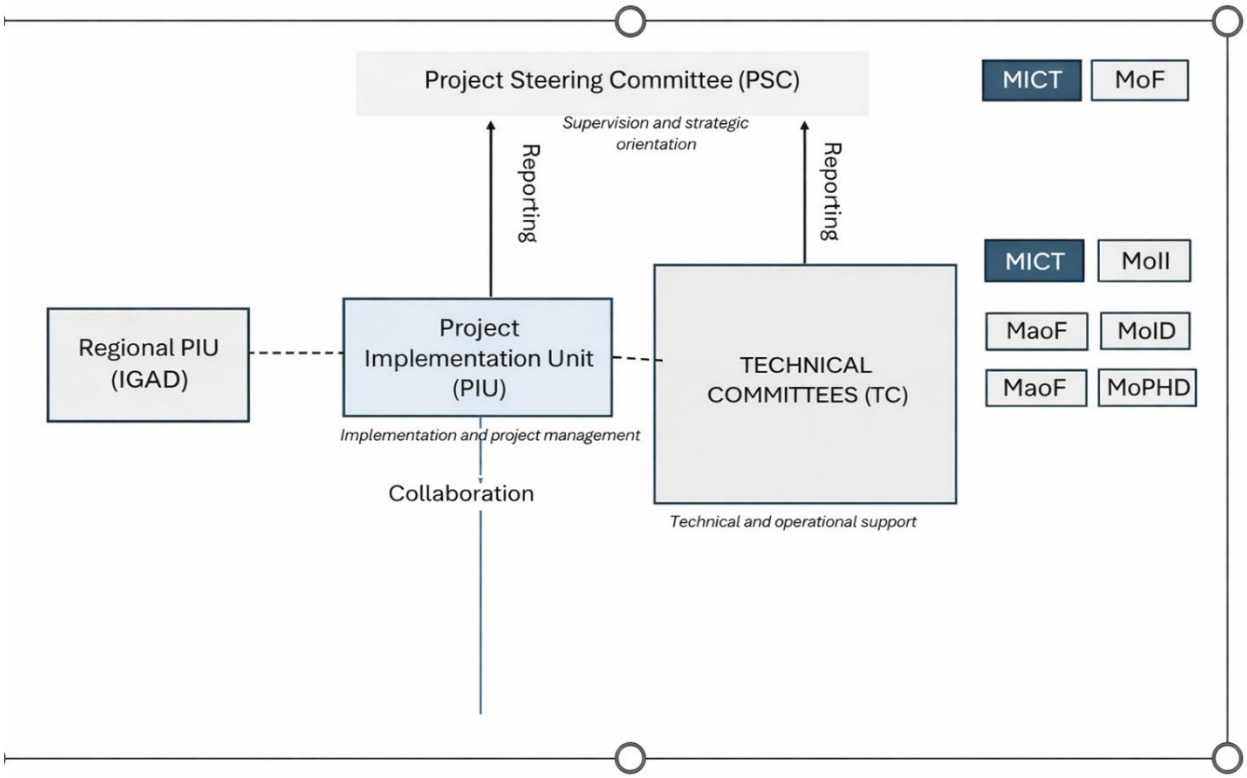

Figure 1-1: Implementation arrangements, Somaliland

1.5 Environment and Social Management Framework

ESMF provides a general impact identification framework to assist the project implementers to screen the projects and institute measures to address adverse environmental and social impacts. To aid in the assessment and management of environmental and social impacts at this early stage in project appraisal and planning. This ESMF has been prepared to provide a general E&S impact identification framework to assist

project implementers in identifying preliminary E&S risks of the projects and institute measures to address adverse environmental and social impacts. Specific information on country-wide project locations, land requirements, biophysical features at a later stage when known will be subject to provisions of herein and of framework documents (Resettlement Policy Framework (RPF) and Security Management Framework (SMF) and site instruments such as Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP) and Resettlement Action Plan (RAP) reports to be prepared at later phases of the project.

The ESMF identifies potential risks and impacts and mitigation measures as per the World Bank's Environmental and Social Framework, including: (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (ii) risks that project impacts fall disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable; (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be disadvantaged or vulnerable; (iv) impacts on the health, safety and well-being of workers and project-affected communities. The ESMF also includes standalone sub plans including; a) e-waste management, b) SEA/SH/GBV risk assessment and prevention, c) Resettlement Policy Framework (RPF), and d) Labor Management Procedures (LMP). Specific objectives of the ESMF include;

- To ensure that the implementation of the project, for which the exact locations of the subproject sites are not definitively identified at this stage, will be carried out in an environmentally and socially sustainable manner.
- To provide information about the scope of adverse E&S risks and impacts expected during subproject planning, construction and operation; describe the approach to mitigation and monitoring actions to be taken; and cost implications.
- To clarify the roles and responsibilities of PIU and other stakeholders with regard to E&S due diligence, management of risks and impacts, and monitoring.
- To provide the project implementers with an E&S screening process and risk management procedures that will enable them to identify, assess and mitigate potential E&S impacts of subproject activities, including through the preparation of a site-specific Environmental and Social Impact Assessments (ESIA) and/ or Environmental and Social Management Plans (ESMP) where applicable

1.6 Approach and Methodology

1.6.1 Literature Review

Review of the existing baseline information and literature material was undertaken and helped in gaining a further and deeper understanding of the proposed project. A desk review of the Somaliland legal framework and policies was also conducted in order to the relevant legislations and policy documents that should be considered during project implementation. Among the documents that were reviewed in order to familiarize and further understand the project included:

- Review of ESMF of similar projects in the region financed by the World Bank;

- Review of the Republic of Somaliland policies, laws, and procedures, regulatory and administrative frameworks to determine the relevant legal requirements for the project.
- Review of Environment and Social Standards (ESS) of the World Bank (WB) in order to determine their applicability to the project;
- Review of other Safeguards documents related to the project, such as the Environmental and Social Commitment Plan ESCP, Stakeholder Engagement Plan - SEP, the Project Appraisal Document (PAD);

1.6.2 Consultations

Stakeholder consultation formed part of the methodology in preparing this ESMF where the project interested and affected stakeholders who could be identified at this early stage were consulted. The stakeholder consultation was significant to the preparation of this ESMF and formed the basis for the determination of potential project impacts and design of viable mitigation measures. The issues raised and concerns expressed including possible mechanisms of addressing these issues and concerns are presented separately under the stakeholder Engagement Plan (SEP) and summarized in **Tables 9.2 to 9.5** presented under chapter 9 of this report

1.6.3 Preparation of ESMF

Preparation of the ESMF included the following stages:

- Collation of baseline data on the environmental conditions of the country in general;
- Identification of positive and negative environmental and social impacts of sub projects investments;
- Identification of environmental and social mitigation measures;
- Preparation of screening procedures to be used for sub project proposals;
- Formulation of environmental and social monitoring plans.

2 BASELINE ENVIRONMENT AND SOCIAL ECONOMIC INFORMATION

2.1 Biophysical Baseline

i. Location:

Somaliland is located in the Horn of Africa where it lies between Latitude 8' to 11' 30' north of the equator and Longitude 42' 45 to 49' East; The country is bordered by Djibouti to the north, Ethiopia to the South and West, the Gulf of Aden to the northeast and Somalia to the East. Somaliland is 284,899 km² with a coastline of 850 kilometers long. Climactically, Somaliland is semi-arid.
with approximately 5.7 million residents as of 2021, the capital and largest city is Hargeisa

Figure 2-1: Map of Somaliland: Source: https://somalilandgov.com/country-profile/the-map/

ii. Climate:

Somaliland is classified into three main climatic zones across the regions. These include: (a) desert zone mainly along the coastal belt, (b) very arid zone in the central and western areas and (c) semi-arid zone in the lower parts of Awdal and present-day Maroodijeex. The latter areas receive the best rainfall up to 500 to 600 mm per year, Togdheer, Sool and Sanaag regions come next with rainfall values of 100 to 400 mm per year. The coastal belt and a small pocket of the area south of Sool region are characterized by very low rainfall with values less than 100 mm per year. 9 Somaliland is subject to four seasons each lasting three months. Winter (Jiilaal) is a dry season occurring from December to mid-March. Spring (Gu') is the long rainy season, lasting from late March to mid-June. Summer (Xagaa) is the third season and occurs from late June to mid-September. Autumn or fall (Dayr) is another rainy season but is much less bountiful than the spring season in many parts of the country, especially the west which is compensated by 'Karan' showers in winter. The Plateau (Hawd) region lies to the south of Ogo. It is generally more heavily populated during the wet season, when surface water is available. It is also an important area for grazing. There is generally

warm and arid climate, though precipitation and the wind can be highly variable in places at certain times of the year (on account of proximity to the equator)[14].

It is arid and hot most of the time, while precipitation is less than 50mm annually. Water Temperature is 21oC in January & 37oC in October. Two monsoon winds are experienced annually. Southwest monsoon blows June to September, while Northeast blows October to March.

Climate Change: Climate is the primary determinant for Somaliland life. Over half of the populations are pastoralists where the timing and amount of rainfall are crucial factors determining the adequacy of grazing and the prospects of prosperity. Unfortunately, Somaliland has been highly susceptible to the effects of climate change and extreme weather conditions, such as periods of extended drought, flash floods, erratic rainfall, and disruption to the monsoon seasons, strong winds, cyclones, sandstorms and dust storms[15]

Recognizing the impact of climate risks for Somaliland future, in 2023, it formulated its National Adaptation Programme of Action to Climate Change; in 2015, it became one of 165 countries that submitted its Intended Nationally Determined Contribution (INDC) action plan a head of the Paris Summit, outlining proposed programs and interventions that would contribute to emissions reductions and the adaptation of its agricultural systems for improved climate resilience. Together, the National Adaptation Programme of Action to Climate Change and the INDC provide a road map to inform and guide technical and financial contributions from all stakeholders

***Disaster Vulnerability*:** Somalia has been ranked as one of the most vulnerable countries and least prepared to deal with the effects climate change, this situation also applies to Somaliland. Rainfall totals during the first half of the April to June *Gu* season are some of the highest on the 1981-2017 record, equivalent to between 130 and over 200 percent of average The heavy rainfall marks the end of prolonged drought across much of the country and is supporting crop development and the regeneration of pasture and water resources. However, the heavy rainfall and subsequent flooding has also led to fatalities, massive displacement, and damage to infrastructure and cropland. Needs are expected to increase in displacement sites and riverine areas in the near term.

iii. Topography:

Somaliland terrain is mostly flat. The Guban plains that parallel the Gulf of Aden coast rise inward towards the rugged Karkaar mountain ranges whose elevation is between 1,800 meters and 2,407 meters above sea at Shimber Berris, the country's highest point. Southward the mountains descend to the Ogo, an elevated plateau of broken mountain terrain and shallow plateau valleys. The Ogo gradually slopes toward the Indian Ocean and in central Somaliland constitutes the Mudug Plain. At the eastern part of the plateau lies the Nugaal valley which has extensive network of intermittent seasonal watercourses. The western part of the Ogo slopes gently southward and gradually merges into the Haud region.

[14] https://www.faoswalim.org/resources/site_files/W-20%20Hydrogeological%20Survey%20and%20Assessment%20of%20Selected%20Areas%20in%20Somaliland%20and%20Puntland.pdf

[15] Ministry of National Resources, *National Adaptation Programme of Action on Climate Change (NAPA)* (Federal Republic of Somaliland: Mogadishu), Apr. 2013, p. 14.

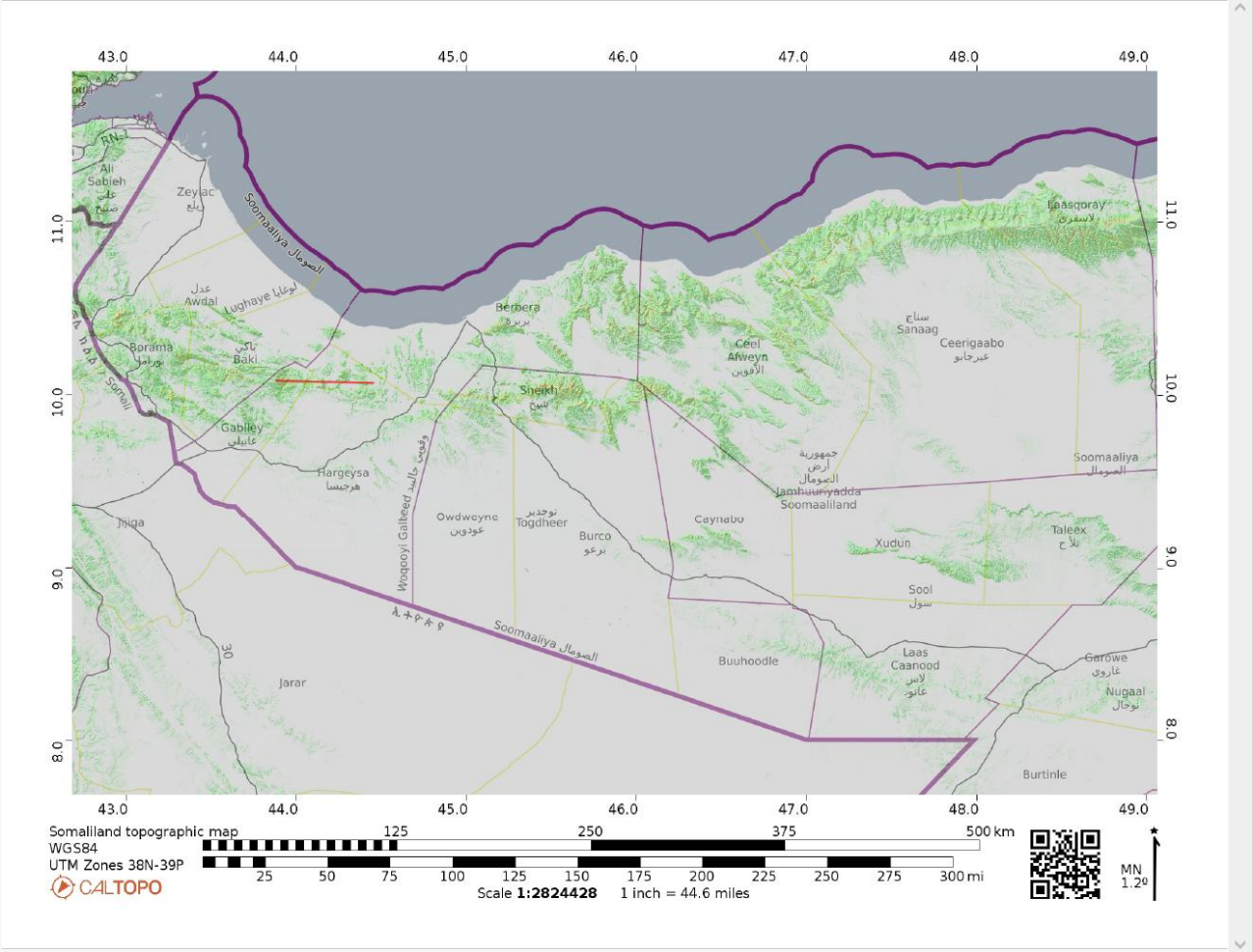

Figure 2-2: Somaliland Topography

iv. Soils and Geology***:***

Key formations in Somaliland include alluvium from the Pleistocene to Holocene period whose general characteristic show Older Pleistocene alluvial sediments and recent alluvium including sandy clay with lenses of sand and fine gravel to coarse gravels and boulders. In some parts are fine sands forming dunes and red soils and calcerites. Quaternary unconsolidated sediments are mostly found in the southern coast and the riverine areas of Southern Somaliland. The North Eastern part of the country is dominated by tertiary sedimentary from the Eocene period.

Geology:

The following major units are dominant geological formations in Somaliland[17]:

1. Precambrian: Basement Complex (Metamorphic and Volcanic rocks)
2. Jurassic: Limestone, Shale, and Sandstone
3. Cretaceous: Nubian sandstones (sandstones and limestones)
4. Tertiary (Eocene): Limestone, evaporitic rocks

a. Auradu Formation (limestones)
b. Taleex Formation (evaporitic rocks)
c. Karkaar Formation (limestones)

5. Tertiary (Oligocene to Miocene): Thick extensive series of sedimentary rocks

a) Daban seires
b) Hafun series and Iskushuban Formation
6. Pleistocene to Recent Alluvium
a) Basaltic rocks
b) Recent alluviums, terraces and coastal beaches

v. Hydrology:

Somaliland has no permanent river instead the country has dry laggas. The surface waters of Somaliland belong to three major river basins:

1. Gulf of Aden basin
2. Dharoor basin
3. Nugaal basin

The surface drainage closely follows the general geomorphology. Much of the area drains in a southeasterly direction towards the Indian Ocean; the extreme north discharges its runoff in of Gulf of Aden.

The drainage network, which is influenced by local topography, rainfall, and geology, is dense to very dense in the northern mountains. It is very thin or virtually non-existent in large parts of the central basin. Run-off in Somaliland basins generally take place in seasonal streams (toggas) and in addition to infiltration, it replenishes stream bed and flood plain aquifers. Run-off only occurs after heavy rainfalls in the form of spate flows, which may last from a few hours to a several days. In sandy 2fans and in valley bottoms in the gently rolling topography large quantities of water are infiltrated into the aquifers. Evaporation and overland flows are also high in these plains. It could be said that "little runoff reaches the seas"[16]. These

[16] https://www.faoswalim.org/resources/site_files/W-20%20Hydrogeological%20Survey%20and%20Assessment%20of%20Selected%20Areas%20in%20Somaliland%20and%20Puntland.pdf

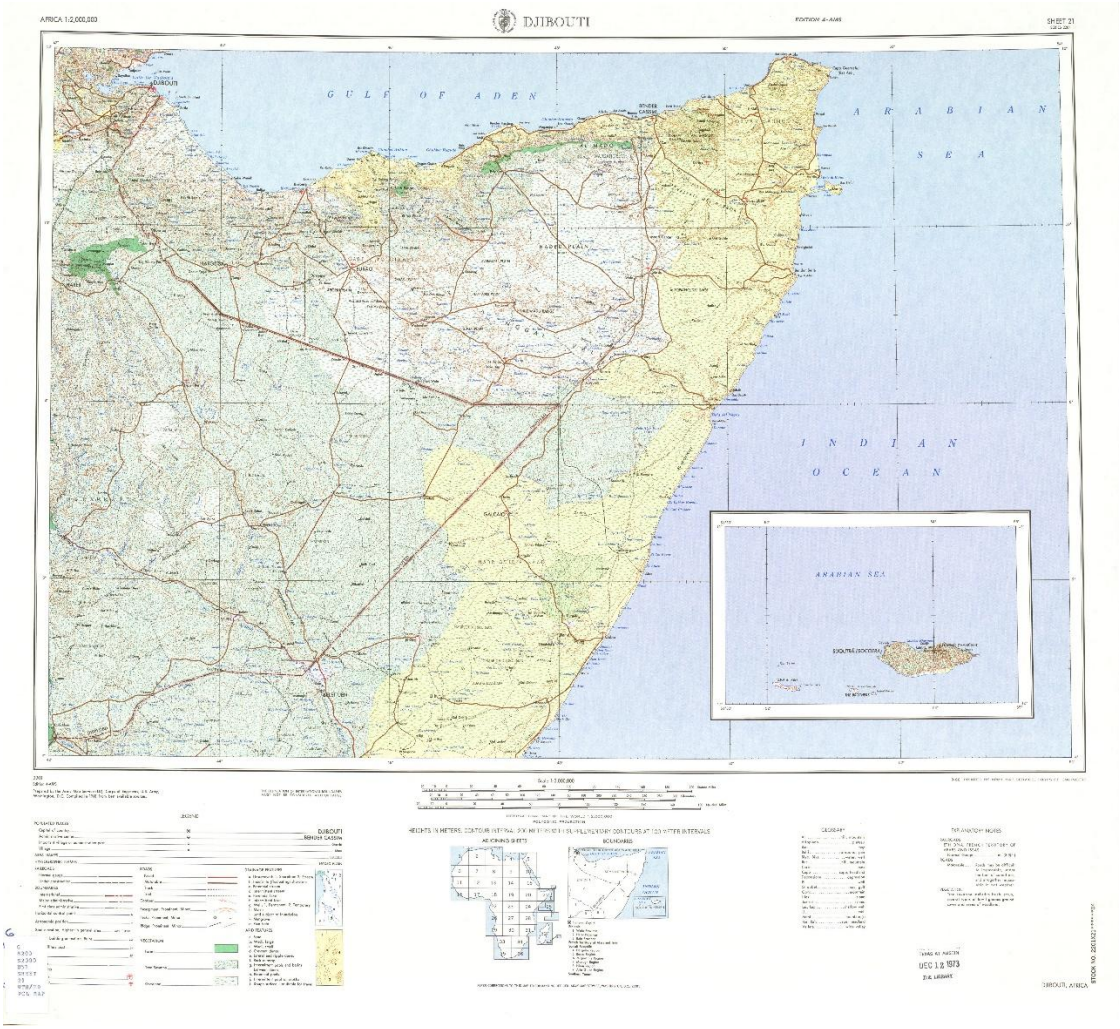

Figure 2-3: Map showing Somaliland Topography[17]

2.2 Biological Environment

vi. Land cover and Vegetation:

About 2% of Somaliland's total land cover is considered arable land, and of this 18.7% is appropriate for irrigated agriculture (IUCN 1997).

Fauna: is mostly pastoralists and the country is home to several livestock species including the Somali goat, Somali Sheep, and dromedary camels. The state has lost many of its wild mammals such as elephants to poaching. The main wild mammals found in Somaliland include fox, Deer, and hyena. One of the most famous endemic mammals in the country is the long naked garanuug (*Litocranius walleri*). Other endemic mammal includes the silver dik-dik (*Madoqua piacentinii*), one of the world's smallest antelopes, and the Somali golden mole (*Calcochloris tytonis*).

[17] https://www.google.com/search?q=soma lia+states+atlas+map

2.3 Social Economic Baseline

vii. Population:

Currently, in the order of 5.7 million people, is undergoing rapid urbanization, increasing from less than 20% in 1975 to around 55% by 2016, and half of Somaliland's population now live in the six regional capitals. The distribution of the population by age, gender and lifestyle is shown in Table 3.
the estimated population is 5.7 million residents as of 2021, the capital and largest city is Hargeisa

Table 2-1: Population distribution by gender, age and lifestyle (2016)

Category	2016 Data
Gender	
Male	1,938,000 (51%)
Female	1,884,000 (49%)
Total	3,822,000
Age distribution	
0-10	30.7%
11-20	27.0%
20-60	39.2%
Over 60	3.2%
Life style	
Urban	54%
Rural	46%

viii. Economic Profile:

The state economy is largely consumption-based and dominated by livestock, while it is also supported by remittances and large aid flows The GDP at constant prices rose from US$1.9 billion in 2012 to US$2.3 billion in 2020, and GDP per capita (at current prices; 2017 base year) rose from US$544 to US$697. This highlights the significant potential for growth yet to be fully exploited due to economic vulnerability to external related shocks.
The major contributions of the three main economic sectors to GDP in 2020 were 8.1 percent from agriculture (production sector), of which livestock clearly stands out, 18.6 percent from industry, and 73.3 percent from services[18]. Continued conflict and frequent natural disasters have contributed to significant poverty in Somaliland. About 69 per cent of Somalis live below the poverty line. Poverty is thereby most acute among children youth, and IDPs, as well as persons living in rural areas[19].

The food security situation has been worsened by the recurrent droughts, as farmers have lost access to agricultural inputs and services formerly provided by the state. The private sector has responded to a degree,

[18] Somaliland National development plan – NDP 3, p. 13
[19] Government of the Federal Republic of Somalia and the World Bank, Somaliland 2020, p. 18.

but the lack of regulation might have led to misuse, and poor-quality control. While industry can provide an increasingly important contribution to economic growth, it will be, for the foreseeable future, second to pastoralism and agriculture.

Human Development

Somaliland scores very low on UNDP's Human Development Index. Although it has not been ranked for a few years, different indicators reveal low scores. For example, life expectancy at birth lies at 57.1 years with a global average of 56 years[20] in low human development countries[21]; and the mortality rate under the age of 5 lies at 127 per 1000 life births, while the global average is 39[22].

Education:

The school enrolment rates in Somaliland are among the lowest in the world. Educational attainment is higher for men than it is for women. Overall, 21 percent of women have no education, compared to 17 percent of men. Approximately 50.9 percent of women and 42.9 percent of men in the households surveyed have not completed primary education. Ten percent of men attended secondary or higher schooling, compared to 9 percent of women. [23]

WASH:

Access to safe water is low in Somaliland; access to basic water supply lies at 83 per cent in the urban areas and 28 per cent in rural areas. 61 per cent of the population has access to basic sanitation facilities in urban areas and 20 per cent in rural areas. According to a UNICEF report, the key challenges are weak water supply management models, high operational management costs, and technical limitations. There is further a lack of a harmonized legal and policy framework and policies in place and inconsistent with implementation[24]. Continued droughts have had negative impact on the water sector, and conflicts have weakened the water supply and sanitation services.

According to recent SLHDS, 41 percent of households get their drinking water from improved water sources. However, there is a slight discrepancy between the urban and rural population, as shown in Figure 4. This data shows that less than half of the population has access to improved drinking water sources, defined as piped water on premises and other drinking water sources, like public taps or standpipes, tube wells or boreholes, protected dug wells, protected springs, and rainwater collection. Table 1 shows the number of additional functioning improved drinking water sources constructed or rehabilitated during the NDP II period. The main interventions by the Ministry of Water Resources Development (MoWRD) are the construction (drilling) or rehabilitation of boreholes, together accounting for 50 percent of the 639 additional water supply systems, and the establishment or rehabilitation of mini-water systems (27.5 percent). s

Agriculture:

[20] UNDP, Human Development Reports. Somaliland, accessed at: http://hdr.undp.org/en/countries/profiles/SOM

[21] UNDP, Human Development Report 2019, p.38.

[22] WHO, Children. Reducing Mortality, factsheet, accessed at: https://www.who.int/news-room/fact-sheets/detail/children-reducing-mortality

[23] Somaliland National development plan – NDP 3, p. 16

[24] UNICEF Somaliland Country Office, Water, Sanitation & Hygiene (WASH) Profile, February 2020, p.2, accessed at: https://www.unicef.org/Somaliland/media/1251/file/Somaliland-wash-profile-February-2020.pdf

The agricultural system in Somaliland is predominantly subsistence in nature. The principal crops are sorghum and maize grown mostly for household consumption. Fruit and horticultural farming, which is relatively small, is mainly commercial. Here, farmers grow mainly tomatoes, lettuce, onions, peppers, cabbages, oranges, lemons, and papaya. Rain-fed farming accounts for 90 per cent of the total area cultivated, while the area under irrigation constitutes only 10 per cent.

Displacement:

The context of Somaliland has multidimensional situation in humanitarian crisis in both natural disasters and man-made disasters in some of the Somaliland regions have faced emergency due to the climatic shocks, droughts and recent conflicts in Sool region all this crisis has made to elevate the magnitude and effect of humanitarian needs as well as the displacement numbers (IDPs)[25]

Table 2-2: Somaliland Displacement Figures by Region

Displacement figures in Somaliland Regions		
Region	**Sites**	**Households**
Maroodijeex	28	17,801
Togdheer	30	28,472
Sanaag	30	10,237
Awdal	16	5,018
Saaxil	8	2.095
Sool	6	3,225
Total	**118**	**64,755 Households**

Security and Conflict:

Somaliland and wider Somalia has had a long history of civil war, which followed the Siad Barre regime that ended in 1991. Clan-based militias turned the country into chaos and prevented an effective central government for a long time. There is significant conflict at different levels in Somaliland. Some insecurity stems from clan competition, which goes back into history and historical movements and power distribution. Often it is combines with localized competition over resources, for example over land or water sources. Such insecurity and conflict can be due to continued local tension between different communities, competition over sources of power, such as governmental positions, as well as competition over aid resources brought down to the state or district level.

Vulnerability and Social Exclusion:

Internal Displacement:

As of January 2012, Somaliland was hosting 85,000 IDPs living in 29 IDP settlements. During the first half of the year this population has increased by 6000 people. Drought and ongoing conflicts continue to be the cause of displacement. While the Protection Cluster conducted several profiling and protection assessment

[25] NDRS, Somaliland Sectoral Displacement Assessment (SSDA), 2023

missions, no comprehensive IDP registration has taken place yet. Extrapolating from sample demographic breakdowns, IDP women and children constitute the majority of the population. The majority of IDPs from Somaliland are illiterate, and their main source of income in their place of origin was livestock trading. IDPs from South Central Somalia are carpenters, mechanics or handcrafts producers. This period marks the end of prolonged droughts for the majority of Somalis living in the HoA region. It is believed that the majority of drought-affected people migrated to nearby urban centers, increasing the number of IDPs.

In Somaliland between February – March 2022, the estimated number of IDP in Togdheer region alone reached 36,427 households scattered in 44 different sites which 97% have been affected by droughts.
IDPs commonly settle in informal urban settlements, where access to services and conditions are poor, and where they often become victims of forced eviction. Conditions of displacement often compound existing conditions of vulnerability and poverty. They are therefore part of the poorest strata in Somaliland, and are often in dire need of access to food, water, sanitation, health services, shelter and education[26]

In view of education and health, IDPs generally report better access than before their displacement. IDPs generally appear to have better access to education. Access to schools was usually more challenging in their previous rural homes. Access to health care has slightly improved since IDPs left their rural homes. 25 per cent of IDPs state that they have better access to health care than previously, while 60 per cent state there is no change. However, there are also significant concerns about improper sanitation and the outbreak of diseases in IDP settlements. However, while this mostly applies to urban IDP, generally, the socio-economic and human development indicators for IDPs are worse than those of non-IDPs.

Gender-Based Violence and Gender Dynamics.
According to the "Expanding Access to Justice Program, Gender Assessment, 2019" report, sexual violence and GBV in the country are very high. In particular, sexual violence against women has been used as a tool of war, a form of sexual hostage-taking as well as child marriage.

There are significant barriers to access to justice. Fear of reprisals or punishment deters survivors of GBV from reporting incidents. Survivors are often reluctant to pursue cases against the perpetrator due to the social stigma associated with rape and other forms of GBV. In south and central Somaliland, survivors, lawyers, witnesses, journalists, and family members face death threats, harassment, and arrests for reporting GBV offences, in particular if perpetrators are from the security forces.

In view of inheritance and access to resources, women are exposed to housing, land and property violations, especially land-grabbing and denials of inheritance. Also, women are not considered principals since they are not diya-paying members, thus do not usually share in diya receipts, even if they relate to a violation against them.

In view of child labor and trafficking, in culture, girls and boys are expected to take part in household chores from around the age of five years, especially in rural areas. The distribution of such tasks is highly gendered and the burden skewed towards girls. Poverty-driven child labor is not generally considered to be a violation

[26] Internal Displacement Monitoring Center 2020, p. 30

of children's rights and children are forcibly recruited within Somaliland and used as labor in agriculture, livestock herding, construction, sexual servitude, domestic service and sexual exploitation.

Interventions for women and children should consider the well-being of the family as a whole. A positive engagement with the issues confronting men should be part of any attempt to address the needs of women and children. A SEAH Prevention and Response Plan is attached as an Annex 12 to this document.

Youth as a Vulnerable Group:
According to OXFARM[33], Youth make up approximately 70% of Somaliland population of 3-4 million, where they face youth unemployment rates hovering around 65%. Irregular migration of youth populations in search of resources of livelihoods, particularly from rural to urban areas, may compound existing challenges linked to youth vulnerability and unemployment. A joint study by the World Bank and the United Nations on youth and attitudes to peace showed that youth peace is not just about ending violence but includes strong and accountable institutions providing services and opportunities for all. According to the Somaliland National Development Programme, unemployment among youth stands at 75 per cent, which is much higher than the nation's average of 61.5 per cent in urban areas and 40.7 per cent in rural and nomadic areas. Unofficial estimates show that at least 65-70 per cent of Somaliland 3.5 million people are under 30.

Clan Dynamics and Minority Groups- The traditional clan system, while evolving, remains a central and defining factor shaping political and socioeconomic realities in Somaliland. Clan affiliation is both a force that has influenced conflict and violence as well as a mechanism for protection and dispute resolution. Customary traditions and conventions help define rights and obligations among kin, clans, and sub-clans, with an emphasis on the preservation of social stability over individual rights in communities and families. At the local level, clan arbitration through the customary system known as xeer has helped regulate access to shared resources, such as grazing areas and water.

Settlement patterns in cities are shaped by clan dynamics through ownership and development of urban land, resulting in communities that are often segregated on the basis of clan. Clan affiliation further affects the extent to which IDPs are included or excluded from development opportunities and access to basic services. Consequently, a resultant pattern of inequality is emerging in Somaliland's cities (Aubrey and Cardoso 2019).

Because of weak enforcement of the law, large disparities have appeared between customary tenure systems and statutory law, engendering illicit appropriation on the part of those most powerful and exacerbating the clan divisions. As a consequence of the prolonged absence of a clear central government authority and the subsequent erosion of legal systems, land and property have been subject to illegal occupation and land grabbing; this remains the main source of violent conflict.

Minority and marginalized groups: Minority groups (occupational groups such as Midgan/Gaboye, Tumal, Yibir, Galgala) are estimated to represent up one-third of the population in Somaliland.[27] However, they

[27] While data on the population of minorities in Somaliland are limited and contested, in 2002, the UN Office for the Coordination of Humanitarian Affairs estimated that the minority groups combined comprised one-third of the population (UN OCHA 2002).
[35] While data on the population of minorities in Somaliland are limited and contested, in 2002, the UN Office for the Coordination of Humanitarian Affairs estimated that the minority groups combined comprised one-third of the population (UN OCHA 2002).

continue to be excluded from political participation, have limited access to justice, are denied multiple rights and are disproportionately affected by natural hazards and conflicts. Fol.ir the most part, Somaliland are artisanal specialists (for example, the Tumaal). Women from minorities and/or among IDPs are particularly affected by multiple violations of their rights, both as women and as members of minority groups. The marginalization and social segregation of vulnerable groups is one of the key driving forces of the protracted massive displacement of people and the difficulty to find durable solutions for them.

Minorities in Somaliland can be considered to be those who fall outside the three main clans of Gabooye, Tumal and Yibir that traditionally fulfilled a particular function considered taboo by the main Somali clans. This included leather working, pottery, metalworking, hunting, and some traditional health practices. These communities are found all over Somaliland. Inter-marriage between young people from these communities and those from the three clans is socially unacceptable – with at times tragic consequences whereby reprisal actions are taken when occasionally such marriages have taken place in spite of social disapproval and threats.

While all of these people are considered Somali and share languages and cultural characteristics with the country's majority clans, social and historical distinctions relegate some of the groups to subordinate and marginalized positions in the society.

COVID-19-

Somaliland is one of the least developed countries in the world with limited capacity to deal and manage the COVID-19 pandemic. This is due to a weak health system with poor structure and governance, appropriate human resources, weak information management system, and deficiency in supplies. The situation is compounded by the extreme povertyrelated deprivation. As of April 6th, 2021, there were 3,320 confirmed cases and 184 deaths in Somaliland. The number of COVID-19 cases in Somaliland may be higher than the reported figures due to under reporting linked to a weak and poorly coordinated information system, limited capacity to test, as well as stigmatization towards Coronavirus. Economically, the country has been hit hard by the global implications of COVID-19. Remittances from the diaspora and livestock exports, which are the main source of revenue, are affected by the global economic crisis caused by the pandemic. The economic crisis is unprecedented in its scale: the pandemic has created a demand shock, a supply shock, and a financial shock all at once (World Bank, 2020).

To contain the spread of the virus, schools and office-based businesses were closed, social events and gatherings prohibited, and flights and travel restricted. The government issued guidelines effective for one month starting from 19 March 2020. Khat chewing establishments were ordered closed, and special guidance was issued for mosques. An initial government decision to close mosques for four weeks was rescinded after pressure from religious leaders. Initially, the entry was banned for flights and people from China, Iran, Italy, France. This was later extended to all countries until June. However, the Ethiopian flights continued to operate but with strict adherence to COVID-19 protocols [28].

WHO has supported deployment of 4,000 health care workers throughout Somaliland, each health care workers aim to visit 5,000 homes per month to actively identify cases and trace contacts. Information on potential cases is relayed to Rapid Response Teams. Testing capacities, however, are still low. The Galmudug

[28] IOM-Displacement Tracking Matrix, 2017

State Ministry of Health, for example, has appealed for support to establish local testing facilities. Currently, samples are transported to Mogadishu for testing. COVID-19 has a significant economic impact. The current projects an 11% decline in the nominal GDP for 2020. Remittances received by nearly half of Somalis have dropped by approximately 50%.

The IDPs in Somaliland:

Over the past few years, Somaliland has become host to households and individuals that have been displaced as a result of conflict, insecurity or drought from all over Somaliland. Hargeisa, Laas Caanood and Borama has the highest number of IDPs, and Stadium site is the largest site in terms of population with over 34,000 IDPs, followed by Statehouse and Erigavo with over 25,000 IDPs each[29].

IDPs Settlements in Hargeisa: The capital city of Somaliland, Hargeisa, is an expanding urban metropolis. Over the years, it has become host to various population groups that have been displaced as a result of conflict, insecurity or drought, and those who migrated to the city for economic purposes. The last decades have seen internally displaced people (IDPs), refugee returnees from Ethiopia and elsewhere, refugees and economic migrants arrive in the city; the majority join communities residing in government-recognized settlements, while others mingle with the host populations across the city.

Due to the relatively peaceful development in Somaliland, Hargeisa has continued to attract migrants and people displaced by conflict in the region, including from south-central Somaliland, Ethiopia, Yemen and Syria. Enclosures, privatization of water, and recurring drought have brought many pastoralists to settle in Hargeisa, and an increasing number of poor Ethiopian migrants are settling in Hargeisa or passing through on their way to the Middle East or Europe.

To obtain comprehensive, reliable and agreed upon data on displacement affected populations, authorities, UN agencies and local and international NGOs decided to undertake a collaborative profiling exercise in Hargeisa led by UNHCR together with the Ministry of Repatriation, Rehabilitation and Reconstruction, with the intention of using the data to inform durable solutions. The profiling in Hargeisa covered 14 settlements across the city and 5 neighborhoods where IDPs were residing among host communities. In all, the total of the population of interest for this report came to 12,225 households or 71,753 individuals.

In terms of population profiles, economic migrants make up the majority (56%) of the population living in Hargeisa settlements. IDPs from Somaliland, mainly displaced by natural disasters like floods and drought, make up 19%, while refugee returnees, i.e. people originally from Somaliland who returned from refugee camps in Ethiopia make up 11%. Settlements also host 412 refugee and asylum-seeker households, as well as households displaced from south-central Somaliland. 263 households who fled from south-central Somaliland were also found living out of settlements.

The municipality of Hargeisa is responsible for assigning the land, but while a lot of public land has been sold off to private persons and companies, poor returning refugees and displaced people have settled on the remaining public land since the late 1990s, such as in 'State House' and 'Stadium'. While some resettlement

29 UNFPA - **COVID-19 Socio-Economic Impact Assessment 2021 - Somaliland**

has taken place at the outskirts of the city on donated and public land (e.g. Ayala), other resettlement projects await that the municipality can make land available[30]

[30] DIIS Report- URBAN INSECURITY, MIGRANTS, AND POLITICAL AUTHORITY, 2017

3 DESCRIPTION OF ADMINISTRATIVE, LEGAL AND POLICY FRAMEWORK

3.1 The Constitution of The Republic of Somaliland 2001

The Constitution of the Republic of Somaliland was approved by referendum on 31 May 2001, the constitution provides for environment and social management under articles summarized below;

Article 12: Public Assets, Natural Resources and Indigenous Production, under this article the constitution provides for below listed

- The land is a public property commonly owned by the nation, and the state is responsible for it.
- The care and safeguarding of property, endowments and public assets is the responsibility of the state and all citizens; and shall be determined by law.
- The Government shall have the power to own and possess movable and immovable property; and to purchase, sell, rent, lease, exchange on equivalent value, or otherwise expend that property in any way which is in accordance with the law
- The central state is responsible for the natural resources of the country, and shall take all possible steps to explore and exploit all these resources which are available in the nation's land or sea. The protection and the best means of the exploitation of these natural resources shall be determined by law.
- Where it is necessary to transfer the ownership or the benefits of a public asset, the transfer shall be affected in accordance with the law.
- The state shall encourage indigenous economic production such as agriculture, livestock, fisheries, minerals, production of frankincense and myrrh and gum etc., and manufacture based on indigenous products.

Somaliland Constitution

Article 18: The Environment and the Relief of Disaster, under this article the constitution provides that for below listed provisions;

- The state shall give a special priority to the protection and safeguarding of the environment, which is essential for the wellbeing of the society, and to the care of the natural resources. Therefore, the care of and (the combating of) the damage to the environment shall be determined by law.
- The state shall undertake relief in disasters such as famine, storms, epidemics, earthquakes, and war

Article 19: The Care of the Vulnerable of the Society, under this article the constitution provides the state shall be responsible for the health, care, development and education of the mother, the child, the disabled who have no one to care for them, and the mentally handicapped persons who are not able and have no one to care for them

Article 20: Work, Trade, and the Welfare of Employees

- All able citizens have a right and a duty to work. The state shall, therefore, be responsible for the creation of work and the facilitating of the skills training of employees.
- The conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law.
- All employees have a right to payment appropriate to the work they undertake, and are free to enter into agreements with their employers on an individual or collective basis. Forced labour is prohibited.
- The state shall endeavour to create understanding and clear rights between employees and employers and shall accordingly introduce a law (in this respect).

3.2 Somaliland Environmental Management Act 2014

The act was enacted based on Article 12 (4) of the Constitution of The Republic of Somaliland concerning the appropriate utilization of the natural resources of the country whose management is exclusively assigned to the central government of Somaliland. And Article 18 (1) of the Constitution requires the state to give special priority to the protection and safeguarding of the environment.

Article 23 provides that Environmental impact assessment must be carried out by a competent person(s) or institution before carrying any of the following activities of a major scale:

- Land use and transformation;
- Water use and disposal;
- Resource removal, including natural living resources;
- Resource renewal;
- Agricultural processes;
- Industrial processes;
- Transportation;
- Energy generation and distribution;
- Waste and sewage disposal; chemical treatment;
- Recreation; and
- Any other area which the Minister considers necessary.

Article 25 address **Application for an Environmental Impact Assessment**, it states that not-withstanding any approval, permit or license granted under this Act or any other law in force in Somaliland, any person, being a proponent of a project, shall before for and financing, commencing, proceeding with, carrying out, executing or conducting or causing to be financed, commenced, proceeded with, carried out, executed or conducted by another person any undertaking specified in the Second Schedule to the Act, submit a project report to the Authority, in the prescribed form, giving the prescribed information and which shall be accompanied by the prescribed fee. Environmental impact assessment studies and reports required under this Act shall be conducted or prepared respectively by individual experts or a firm of experts authorized in that behalf by the Authority.

3.3 Rape, fornication and other related offences bill- law no. 78/2020- Somaliland

The House of Representatives in September 2020 passed the Rape, Fornication and other Related Offences Bill- Law No. 78/2020. Article 11 of the Act address Sexual Harassment and Assault, it provides that "*Any mature and mentally sane individual who inappropriately touches a person other than their spouse, or compels a person to touch him/her inappropriately, or forces a person to touch another person inappropriately, has committed a criminal act of unwelcome sexual advances and inappropriate touching and is liable to a penalty of 1-3 years of imprisonment. If the criminal act stated in Paragraph 1 of this Article, is committed against a minor, or a vulnerable person, the offender will be liable to 3-5 years of imprisonment"*. The law does not provide any details on legal age of a minor in Somaliland or sex consent. However, according to the Family Code (1975), the legal age for marriage in Somaliland is 18 for both men and women

3.4 Institutional Capacity for Environmental Management

3.4.1 Ministry of Environment and Rural Development (ME&PD)

Article 4 of Somaliland Environment and Management Act 2014 address administration of environment matters, it provides that In the implementation of any regulatory environmental framework, the role of the Ministry of Environment and Rural Development (ME&PD) which is mandated to for the protection of environment is crucial. And that the Minister shall be overall responsible for matters relating to environment and shall in that respect be responsible for articulation of policy guidelines necessary for the promotion, protection and sustainable management of environment in Somaliland

Article 5 provides the functions of the Ministry as summarized below

- Determine policies for the management, protection and use of the environment;
- Prepare and publish policies, strategies, objectives and standards for the management and protection of the environment;
- Co-ordinate environmental management at national level; and
- Monitor and ensure compliance with the Act.

3.4.2 Somaliland Environmental Management Authority (SEMA)

Article 6 Somaliland Environment and Management Act 2014 provide for Establishment of a body to be called the Somaliland Environmental Management Authority with below listed provisions

- The Authority shall be the principal agency in Somaliland for the Management of the Environment and shall coordinate, monitor and supervise all activities in the field of environment.
- The Authority shall be a body corporate with perpetual succession and a common seal.
- The Authority shall, in its own name, be capable of suing and being sued and doing and suffering all acts and things as bodies corporate may lawfully do or suffer.
- The Authority shall be under the general supervision of the Minister

Functions of SEMA will be as listed below

- To coordinate the implementation of Government policy and the decisions of the Sustainable Development Advisory Committee (SDAC)
- To ensure the integration of environmental concerns in overall national planning through coordination with the relevant Ministries, departments and agencies of the Government.
- To liaise with the private sector, intergovernmental organizations, nongovernmental agencies and governmental agencies of other states of issues relating to the environment;
- To propose environmental policies and strategies to the policy SDAC;
- To initiate legislative proposals, standards and guidelines on the environment in accordance with the Act;
- To review and approve environmental impact assessments and environmental impact statements submitted in accordance with this Act or any other law;
- To promote public awareness through formal, no formal and informal education about environmental issues;
- To undertake such studies and submit such reports and recommendations with respect to the environmental as the Government or the SDAC may consider necessary.
- To ensure observance of proper safeguards in the planning and execution of all developmental projects, including those already in existence that have or are likely to have significant impact on the environment.
- To prepare and disseminate a state of the environment report once in every two years;
- To mobilize, expedite and monitor resources for environmental management
- To perform such other functions as the Government may assign to the Authority.

3.4.3 National Environment Policy (2015)

Governance of the Environmental Sector

Legislation

Objective

To create a legal framework for the implementation of the National Policy on Environment and sustainable environmental management

b) Guiding Principles

The laws that require amendment or new laws that require promulgation will:

- Be formulated within the political, social, cultural and economic situation prevailing in the country and will not compromise the principles of sustainable development.
- Ensure that all people living in the country have the fundamental right to an environment suitable for their health and well-being.

- Provide a framework for formulating, review, updating sectoral laws and reforming institutions on the management of the environment to ensure harmony
- Provide a broad framework for both enforcement and incentive measures.
- Foster regional and international cooperation through agreements, conventions and treaties on sustainable utilization of natural resources and environmental management.
- Develop a forum to achieve maximum participation of individuals, communities and the private sector in the development of policies, laws and plans for the management of the environment.

3.4.4 Environmental Planning

a) Objective

To ensure that national, regional and local development plans integrate environmental concerns, in order to improve environmental management and ensure sensitivity to local concerns and needs.

b) Guiding Principles

1. A National Environmental Action Plan (NEAP) should be prepared and to be formally recognized by all government ministries as the key instrument for national environmental planning and the implementation of development programs.
2. Regional Environmental Action Plans shall take into consideration local concerns and needs and be disseminated to the public.
3. Ensure that the Regional Environmental Action Plans are prepared and are consistent with the NEAP.
4. Ensure that Community Environment Action Plans are prepared and are consistent with the NEAP.
5. Identify and zone environmentally critical areas in a national network to facilitate planning and investment prioritization.

Environmental Impact Assessment, Audits and Monitoring

c) Objective

To develop a system and guidelines for Environmental Impact Assessment (EIA) and Initial Environmental Examination (IEE), approval, audits, monitoring, and evaluation so that adverse environmental impacts can be eliminated or mitigated and environmental benefits enhanced.

d) Guiding Principles

- EIAs will be required as deemed necessary to ensure that public and private sector development options are environmentally sound and sustainable and that any environmental consequences are recognized early and considered in project design, and implementation.
- Obligatory IEE screening will precede EIAs to determine whether full EIAs are required for the specific site in question.

- EIAs will consider not only biophysical impact but will also address environmental impact in terms of existing social, economic, political and cultural conditions.
- Environmental Mitigation Plans for social and environmental impacts will be required for all activities where the EIA has determined a negative environmental threshold.
- Environmental Audits, including inspections, record-keeping and monitoring will be required for activities as determined by the mitigation plans or otherwise.
- Environmental Impact Assessments and Statements shall be made public and public comments on them invited and taken into consideration.
- EIA procedures should be cost effective, appropriate, reasonable and commensurate with the size, scope and relative impacts of the project or program in question.
- Obligatory decommissioning plans are required for mining operations and major industrial undertakings for specific locations.

6.3.4.6. Environmental Education and Public Awareness

a) Objective

To increase public and political awareness and understanding of the need for environmental protection, sustainable natural resource utilization, conservation and management as essential partners in development

b. Guiding Principles

- Environmental protection requires political and public support and understanding of its importance and relevance to daily life.
- Promote the establishment of a central integrated database for storage and retrieval of all environmental data in an iterative manner within the MoERD and with links to all relevant agencies and to all development projects in the provinces.
- Environmental education shall be taught on a multi-disciplinary basis and integrated into on-going curricula at all levels and on a continuous basis.
- Environmental education and awareness need to be promoted through formal and non-formal education channels by all government institutions, NGOs, and the private sector.
- An environmental information, education and communication program to enhance public understanding and awareness shall be targeted to all those in public and private sectors whose activities affect the environment in one way or another.

3.1.6. Private Sector and Community Participation

a) Objectives

To mobilize initiatives and resources in the private sector, NGOs and CBOs to achieve sustainable environmental management. To involve civil society in general and local communities in particular, in

environmental planning and actions at all levels and empower them to protect, conserve and sustainably utilize and benefit from the Nation's natural resources.

b) Guiding Principles

- Natural resource conservation, protection and sustainable utilization can only be promoted if local authority and community participation, empowerment and social and economic benefits from natural resources are guaranteed.
- Government Ministries and Departments shall move towards becoming supervisory and regulatory bodies which provide enabling policy and legislative frameworks, for sustainable resource management activities.
- Implementation strategies will focus more on establishing an enabling environment to promote community-based sustainable natural resource use and less on traditional government managed development projects.
- Significant tangible benefits should remain with local communities when there is utilization of natural resources on public and customary land.

ix. 3.1.7. Environmental Human Resource Development and Research

a) Objectives

To provide training needed to implement a national program of environmental protection, conservation and management.

To carry out the basic and applied research needed to support sustainable management of the environment.

b. Guiding Principles

- Pure and applied environmentally-related research will be promoted and shall be demand-driven and prioritized.
- Adequate capacity building is critical in environmental management, planning, assessment of impacts, monitoring, evaluation and capacity for these should be reviewed in the core ministry (MoERD) line ministries and other relevant sector stakeholders.

Gender, Youth and Children

a) Objective

To integrate gender, youth and children concerns in environmental planning decisions at all levels to ensure sustainable social and economic development as an integral component in gender and development policy.

b. Guiding Principles

- Both women and men including the youth should play a key role in the sustainable utilization of renewable natural resources and other development programs.
- Basic training in environmental and natural resource management will include analysis, methodologies and tools for gender mainstreaming
- Training, research and program implementation should incorporate techniques for finding solutions to gender issues.
- Developing an environmental awareness among youth and children is critical to environmental sustainability now and in the future.

3.1.9. Demographic Planning

a. Objective

To ensure that the growth of the country's population does not lead to environmental degradation

b. Guiding Principles

- While it is the right of each individual and couple to decide for themselves the number of children they wish to bear, child spacing should be encouraged.
- The annual growth rate of the Somaliland population should be reduced substantially so that the growth of the population is more consistent with that of the economy.
- Information, Education and Communication (IEC) is vital in creating increased demand for family planning services and therefore IEC activities must be well coordinated to ensure that the messages of all agencies involved are synchronized.
- Population education in schools and colleges will make a major contribution to the implementation of the national population program that fully comprehends the relationships between national demography, the economy and the environment.
- In order to ensure effective family planning delivery, it is also necessary to improve maternal and child health, provision of safe drinking water and adequate sanitation, educational services, opportunities of productive employment and increased agricultural productivity.
- Success in achieving the objective of population policy crucially depends on changing negative traditional attitudes and practices as they impinge on the present disadvantaged status of women in Somaliland.
- It is essential that responsibility for coordinating population policies and programs be entrusted to a high-powered body.

3.1.10Human Settlements and Health

a. Objective

To improve the settlement conditions of the urban and rural population with a view to boosting the implementation of health, environmental conservation and poverty reduction strategies.

To promote urban and rural housing planning services that provide all inhabitants with a healthy living environment and strengthen existing strategies to mitigate the impact of HIV/AIDS upon the people, the economy and the national development process.

b. Guiding Principles

- Urban, district and rural planning and development activities should incorporate human settlement and health concerns.
- Human settlements should incorporate environmental concerns as well as disaster preparedness.
- Temporary settlements for refugees and other displaced people are managed using the same guidelines for environmental, pollution and health concerns as for all other human settlements including environmental impact assessment and monitoring.
- Development and improvement of human settlements should incorporate the concept of community development with focus upon social services, particularly water supply, schools, health facilities, recreation facilities, communications, transport and security which is difficult to maintain and tend to be environmentally unfriendly
- Every person has the obligation to bring an action against any person whose activities or omissions have or are likely to have an adverse impact on the environment.

3.1.11. Air Quality and Climate Change

a. Objective

To minimize the adverse impact of climate change and to reduce air pollution and greenhouse gas emissions and to ensure that all citizens should have access to outdoor air without significant risk to their health.

b. Guiding Principles

- The climate is a fundamental natural resource which, if not well managed, can become a major constraint to socio-economic development.
- Air pollution should be reduced in order to provide a healthy and sustainable environment for social and economic development.
- Greenhouse gas emissions must be reduced and greenhouse gas sinks must be enhanced in order to prevent interference with the climate system.
- It is necessary to control localized air pollution, especially in the urban environment, so as to reduce incidences of airborne diseases.
- Bush fires must be controlled to reduce air pollution and environmental hazards.

3.1.12. Conservation of Biological Diversity and Bio- safety

a. Objective

To conserve, manage and utilize sustainably the country's biological diversity, ecosystems, natural and anthropic habitats, genetic resources and plant and animal species by preservation of the Nation's natural heritage for the present and posterity.

To ensure an appropriate level of protection of human, animal and plant health and habitat, while ensuring the well-being of the country

b. Guiding Principles

- Recognition the importance of protecting it's people, environment and biodiversity while promoting sustainable social and economic development of Somaliland
- Conservation of biological diversity is a form of natural resource management which has as its primary goal the maintenance of Somaliland's biological resources to meet the needs and aspirations of both present and future generations.
- Biodiversity has an intrinsic value and is vital for agricultural, medicinal, scientific, research, tourism and other socio-economic developments.
- The conservation of biodiversity both within and outside protected areas is critical to environmental sustainability together with other policies such as land use policy and sustainable agriculture policies.

3.1.13. Land Tenure and Land Use

a. Objective

To promote sustainable use of the land resources of Somaliland, primarily, but not exclusively, for agricultural purposes by strengthening and clearly defining security of tenure over land resources including State Land, Reserves and Trust land in the process and

To establish a land tenure system conducive to increasing long term investment in the environment and natural resources sector and ensure the continuity of activities that guarantee sustainable resources use

b. Guiding Principles

- The provision of security of tenure for smallholder farmers against estate or ranch land expansion is important for sustainable use resource-based production systems.
- Empowering CBOs to regulate resource management on common property in their respective areas should be given high priority.
- Customary rights to land and resource use will be recognized and protected, or alternatives provided, including the opportunity to convert to leasehold.
- A comprehensive land tenure and land use policy shall encompass not only property rights to land but also other natural resources.

- Inappropriate land management that results in adverse environmental impacts on the environment and damage to natural resources would be used a basis for re-entry and revocation land lease.

2. Land Acquisition

1. In Somaliland there is no specific written law on land acquisition. Land disputes are managed by the traditional law of *Xeer*[31].

2.1 The Constitution Article 12: Public Assets, Natural Resources and Indigenous Production states:

1. The land is public property commonly owned by the nation, and the state is responsible for it.

2. The care and safeguarding of property, endowments and public assets is the responsibility of the state and all citizens; **and shall be determined by law**[32].

3. The Government shall have the power to own and possess movable and immovable property; and to purchase, sell, rent, lease, and exchange on equivalent value, or otherwise expend that property in any way which is **in accordance with the law**

2.2 Draft Land Tenure Policy

Overall Land Tenure Principles

2. A key constituent in the process of formulation of this law, the principles that will guide tenure policy include secure equitable access to land for use and ownership, sustainable land use and effective and efficient regulation. The Policy recognizes the following as cross-cutting issues; ministerial cooperation and co-facilitation and equal distribution of land rights. The Government acknowledges the basic need of tenure security. As a result, it shall be guided by and implement the following principles:

a) Designate all urban and rural land as well as natural resources in Somaliland as common property of the nation, upon which control, administration and management is exclusively vested in the state;
b) Facilitate the right to obtain land without payment for Somaliland farmers and protect against eviction from their possession;
c) Enforce the legal rights of access of pastoralists to free land grazing and cultivation as well as the right not to be displaced from their own lands;
d) Regulate land tenure and ensure tenure security for all socioeconomic groups, and that members of the different clans, genders, class origins, and religious and political affiliations have equal access to land for production processes under a decentralized system;
e) Protect individual property rights and communal rights in urban and rural settlements, particularly for displaced populations and those undergoing livelihood crises;
f) Ensure compensation for populations whose habitat or livelihoods have been affected by government programming;
g) Endeavor to ensure that all land is put into productive use within an environmentally and

[31] See Annex 14.
[32] The Law referred to is the traditional *Xeer.*

economically sustainable framework;

h) **Protect the right of pastoralists to free access to their traditional grazing lands and promote rural livelihoods**;

i) Protection and utilization of national water resources is the responsibility of the Ministry of Water and Mineral Resources. The ministry shall determine conditions and methods required for the optimum allocation and utilization of water. The ministry shall issue permits to construct and operate hydraulic water works;

j) The Ministry of Public Works and Housing shall draft laws to create town-planning area with a view to promote the development of towns in an economically sound manner. The draft law shall fix in a precise manner the limits of town area;

k) Ministries of Agriculture, Environment and Pastoral Development, Water and Natural Resources, shall collectively prepare a national plan which shall demarcate between agricultural land, forest reserve and water or mineral resource areas;

l) Facilitate the right to participate in all decision-making process and activities relating to land for local communities and the civil society that work to represent them.

3. In all instances where involuntary land acquisition results in involuntary loss of shelter, loss of assets or access to assets or means of livelihood the procedures for Involuntary Resettlement will be applied. The allocation and leasing of any and all communal land for all construction will require an "Allocation Note" (**Annex 9 - Contribution of Assets**) endorsed by the impacted community evidenced by a written protocol of the consultation between the traditional authorities and their communities[33]and signed by the local government and traditional authority.

2.3 Land Categories[34]

10. The land in the Republic of Somaliland may be classified into the following categories:

A. **Grazing land;** a field covered with grass or herbage and suitable for grazing by livestock.

B. **Pastureland;** is an area with lush herbaceous vegetation cover used for the grazing of ungulatelivestock as part of a farm or ranch.

C. **Agricultural land;** refers to areas of land in which agriculture is recognized as the priority use. Farming is encouraged and non-agricultural uses are controlled.

D. **Rangeland:** a large, mostly unimproved section of land that is predominantly used for livestockgrazing. This is land on which the natural vegetation is dominated by native grasses, grass-like plants, forbs, and shrubs. Rangeland also consists of areas seeded to native or adapted introduced species that are managed like native vegetation.

E. **Conservation land;** an area that is fenced-off or closed-off from common use for the protection and conservation of particular endemic and endangered natural resources (e.g. plants, animals, land, energy, minerals) or of historical/archaeological artefacts (e.g. paintings, monuments, etc) for the future. (see 7.1)

F. **Mining land;** a natural deposit of ores, coal, precious stones where such minerals are extracted or obtained either by excavation or by washing the soil

[33] *This protocol is to be written by a clerk of the court of traditional authorities and supplemented by an observatory report made by any neutral persons selected to be present at the consultation. A time frame shall be set for when and how and for how long the consultation takes place.*

[34] *Draft Land Tenure Policy*

G. **Urban land;** is an area with a relatively higher population density of humans in comparison to the areas surrounding it known as rural areas. As such, urban areas also constitute increased density of human-created structures than rural areas.

H. **National Parks;** land that is set aside for the preservation of unique landscapes for the pleasure of the people. The land may vary in sizes and natural characteristics as well as the usage for which it is particularly preserved.

I. **Graveyards;** an area that is specifically designated as burying ground where dead bodies or remains are buried.

Shall be respected and protected by the state;

a) Graveyards of all religions shall be equally respected and protected;
b) Specific land shall be allocated for graveyards in all urban settlements;
c) The Minister of Religious Affairs and local municipalities shall be responsible for the protection of graveyards and the use of land allocated for graveyards;
d) The Minster of Religious Affairs shall issue regulations on protection of graveyards and use of land designated for graveyards.

J. **Public works land;** an area where public buildings, roads, bridges, dams, housing developments are constructed or engineered by the state on behalf of the community.

K. **Leisure and recreational land;** areas of open space provided for recreational use and resembling open woodlands where trees are chosen for their beauty and shade.

L. Religious, historical and archaeological sites;

a) Shall be under the direct preservation and protection of the Government;
b) The Minister of Tourism and Heritage shall be mandated to declare any new sight of historical, archaeological or cultural value as a protected area.

M. **Hazardous land;** an area that is designated as unsafe by appropriate authorities for the settlement or subsistence of humans as a result of either human-made causes such as the disposal of toxic substances that contaminate or pollute the environment or natural threats such as earthquakes, volcanoes and landslides that threaten human safety.

3.3.2. Land tenure

8. Land is a basic resource for livestock development hence the need to encourage its optimal use. A large proportion of the land is under communal ownership. Lack of guaranteed security of land tenure and appropriate mechanisms for land ownership for livestock production has increased social conflicts between livestock farmers and other land users. In addition, there is no incentive for rational rangeland management and this discourages investments in improved pastures and water supplies.

9. Expansion of illegal enclosures in rangelands has resulted into reduction of grazing areas and concentration of large numbers of animals in the marginal lands leading to overgrazing and environmental degradation. Furthermore, there is scarcity of land use planners for demarcation of land for various uses.

3.4. Strategic Goal (4): Promote Sustainable Natural Resource Management

10. Similar to the other east African countries, Somaliland is experiencing enormous environmental problems which have a harmful impact on agricultural production. Among them are the degradation of arable land, loss of vegetation cover and biodiversity and scarcity of water resources which consequently reduces the yield of both subsistence and commercial farms.

The aim of this goal is to promote sustainable natural resource (land, water and vegetation) management for effective and efficient natural resource utilization and sustaining increase of sector productivity.

3.4.1. Strategic objectives of Goal (4):

- To promote development and sustainable utilization of agricultural land resources

- To promote development and efficient use of water resources

3.5. To promote development and sustainable utilization of agricultural land resources

11. In Somaliland, it is estimated approximately 10% of the total land is suitable for cultivation but currently only3% are cultivated. Rain fed farming accounts for 90% while the remaining 10% is irrigated. The sector is poorly developed and characterized by low productivity. This is due number of factors including land degradation and loss of top fertile soil through soil erosion and poor agriculture practices. Therefore, the interventions of this objective will aim at reducing degradations, soil conservation and sustainable utilization of agricultural land.

Interventions

- Agricultural land registration and issuance of land ownership deeds
- Arbitration and resolution of agriculture land disputes
- Creating sustainable agricultural land use and management of environment through development, amendment and implementation of legal and policy framework.
- Establishment and strengthening coordination among implementation agencies.
- Promotion of community involvement and participatory approaches in land use planning for sustainable land resource management to prevent land degradation.
- Conservation of land resources and restoration of land productivity through soil conservation mechanisms and good agricultural practices.
- Increasing land resource development and management budget allocations.
- Conducting survey for mapping agricultural potential land, currently cultivated land and degraded arable land.

3.6. To Promote Development and Efficient Use of Water Resources

12. Somaliland is mainly an arid and semi-arid country with insufficient and erratic rainfall making rainfed agriculture unreliable. On the other hand, the country is not gifted any perennial rivers that flow round the year. It rather is endowed with seasonal rivers that bring flash floods from upstream mountainous watersheds during the rainy seasons.

In order to increase and sustain country's agriculture productivity, the ministry will improve productivity and sustainability of agricultural water management.

Interventions

- Creation of a conducive environment for effective water resource development and management through formulation of needed policy framework and amending and implementation of existing legal framework.
- Promotion of appropriate dry land water-efficient management technologies such as irrigation technologies, and on farm integrated water conservation to maximize water use efficiency.
- Conducting irrigation potential assessment and development of a comprehensive irrigation development plan.
- Promote rehabilitation and development of irrigation water sources (canals, shallow-wells, water reservoirs and dams) and protect water catchments areas.
- Promote rainwater-harvesting technologies for domestic and agricultural purposes e.g. roof water harvesting.
- Conducting detailed flood-based farming potential assessment and mapping.

- Design and implement community participatory re-afforestation and agro-forestry programs to reclaim and protect the environment.
- Exposure visits of decision makers, experts, community leaders and agro-pastoralists.

3.7. The Agricultural Land Law (8/1998).

13. The law transfers all land from traditional authorities to the government. Individuals desiring land were to register their holdings within a 6 months' period. The law does not recognize customary land holdings. In Somaliland the Authority of the agricultural permission laws give mandate ministry of agricultural developments.

14. From November 14, 2019, the new National Policy, National Eviction Guidelines and the Interim Protocol on Land Distribution for Housing to Eligible Refugee-Returnees and IDP. The policy codifies the roles and responsibilities between the Governments. The National Eviction Guidelines address the human rights implications of evictions in urban and rural areas by preventing arbitrary and forced eviction of occupiers of public and private properties, from homes, encampments and other lands.

3.8. The Land Management Act 17/2001,

Gives local council cities in Somaliland their mandate:

3.8.1. Article 1 Power of Land Administration

15. In addition to God, the entire territory of the Republic of Somaliland belongs to the Government of Somaliland (as stipulated in Article 12, Clause 1 of the Constitution) and therefore its administrative powers, transfers and legislative proposals belong to the Council of Ministers.

16. The President of the Republic of Somaliland, upon hearing the advice of the Council of Ministers and the National Urban Design Commission of the Republic of Somaliland, shall issue a Presidential Decree on the acquisition of land or buildings for the common good. Public purpose means: construction sites, New Roads, Broadway, bridges, power lines, telecommunications, government offices and other public buildings and shall be published in the Official Gazette of the Government.

3.8.2. Article 2 Land Power

17. The administration and provision of construction positions in the cities (districts) of the Republic of Somaliland, is owned by the local government (Executive Committee of the local government).

18. The management of any public interest such as; The land of government offices, houses, diplomats, factories and all the former public places (public area) is owned by the central government.

18.2. There shall be an office representing the National Commission for General Designs, located at the headquarters of the Ministry of Public Works at the District, Regional, and National.

18.3. The office referred to in paragraph 3 of this Article shall verify that the land deeds completed by the land administration of the municipality are in accordance with the general design of the city.

18.4. It is prohibited for the Armed Forces and other government agencies other than those mentioned in Clauses 1 and 2 of this Article to interfere in any way with the administration of land matters.

3.8.3. Other articles

19. Article 20 declares that any structures, whether permanent or temporarily constructed without being in accordance with the land allocation process will be considered to be illegal.

20. Article 21 addresses eviction and demolition of illegal property. Section 1 of this article indicates "The Municipal government while implementing the city urban plan will have the authority to demolish illegally constructed structures be, they temporary or permanent". In Section 2 of this article eviction from temporary structures can arise if the said land is part of a plan in which it is set aside and it is needed for purposes other than residential use and in which case the evicted parties will be settled in a suitable land and their eviction

and settlement costs will be covered by the local government. As per Section 3 "Illegal structures cannot be constructed for the purpose of acquiring land and eviction of such structures will not be due for compensation". Section 4 mentions that "Parties affected by eviction or demolition of single structures or whole estates will have priority in any land allocation resulting from such activity".

21. Article 22 addresses demolition of legal property stating "When the demolition of a legal property results from needs arising due to City Planning, the following will apply: a) The affected party will be compensated for the value of their property. b) The affected party will be allocated with land not less than size to his evicted land and will be offered legal documents".

22. Article 23 addresses expropriation of land for the purpose of common good pointing out: a) Following consultation with the permanent national planning committee and having gained their approval, the Mayor will have the authority to issue an order to take over legally allocated built land or otherwise for the purpose of common good. b) Any party affected by section 1 above will have a right to the following: I) compensation in value similar to the said property and II) be provided with similar property that is equal in value and size to the said property.

23. Article 28 of Law No. 17 establishes the Land Dispute Tribunals: quasi- judicial administrative bodies composed of seven members with knowledge and experience in land issues nominated by various ministries and appointed by the Minister of Interior.

3.8.4. Article 31: The Right to Own Private Property

1. Every person shall have the right to own private property, provided that it is acquired lawfully
2. Private property acquired lawfully shall not be expropriated except for reasons of public interest and provided that proper compensation is paid.
3. The law shall determine matters that are within the public interest, which may bring about the expropriation of private property.

24. Somaliland Urban Land Management Act covers all matters related to urban land and provides guidelines on the governance, and management of urban land. Chapter Four of this law covers land right and obligations.

25. Article 38 confirms the right to own land and property stating: "Every person has the right to legally own land and property in accordance with Article 17 of the Constitution of the Somaliland and no property can be repossessed without legal justification unless it is in the public interest, in which case appropriate compensation must be made at the earliest opportunity".

26. Article 22 of this law deals with the repossession of private land for public interest whereby the mayor of a town is vested with powers to repose previously allotted land, subject to approval from local councilors, and the Ministry of Public Works. This law states that those affected by this order will have the right to the following: a) Compensation to the value of the structure on the site. b) The right to an alternative and equivalent (in value and size) to the repossessed parcel of land. Although compensation is to be granted under this law, it is also limited to legal structures, as indicated "The compensation will be paid if the structure was lawful". In addition to this, relocation costs will be borne by the affected party. The law also states that the process to be followed during repossession will be in accordance with the Land Laws and the Somaliland Constitution. This law strictly limits the use of such repossessed land for public use only. This Article has a grievance redressal mechanism "Any individual affected by the repossession, who does not receive compensation proposed under this article, has the right to request the court for compensation arising from the repossession and the damages related to it".

27. Article 35 of this law covers relocation or demolition of illegal property stating: The local authority, in fulfillment of the urban plan, has power to demolish illegal structures, whether permanent or temporary.

This law permits "Relocation of a settlement when an emerging public interest need arises or when the development of the settlement does not comply with the urban plan or when a specific location has been zoned for a different purpose". The law also states that the inhabitants must be relocated to a suitable alternative and the costs will be borne by the local authority. Although the above is very clear in relation to compensation for illegal structures there is some lack of clarity as the next section seems to be contradictory indicating: "Actions taken against illegal construction do not allow the individual to claim allotment of another parcel and relocation (of inhabitants of illegal structures) does not include any compensation. Only inhabitants of settlements that are relocated will have a rightful claim to allotment of land that may arise from the relocation."

28. Article 36 addresses the demolition of lawful structures indicating: "When a lawfully constructed structure is recommended for demolition during the review of a town's urban master plan, the owner of the structure will have a right to: a) receive compensation equivalent to the value of the demolished structure and to be relieved of the ownership certificate for this parcel; and b) be allocated land whose size is equivalent to the previous parcel and to be provided with an ownership certificate".

29. Resettlement is also addressed by Somaliland Urban Regulatory Framework passed by cabinet as policy in November 2016. Section 3.9.13 covers involuntary relocation beginning with the need to avoid or minimize resettlement. This Policy indicates: "When direct economic and social impacts are caused by taking of land resulting in involuntary relocation or loss of shelter, loss of assets or access to assets, loss of income sources or means of livelihood whether or not the affected persons must move to another location or the restriction of access to legally designated parks and protected areas result in adverse impacts on the livelihoods of the displaced persons, the following guidelines shall be required:

30. Where relocation cannot be avoided, displaced persons shall be meaningfully consulted throughout the entire project cycle individually and collectively, with a right to appeal, and receive the opportunity to participate in the project activities, and share the project benefits;

31. The property or use rights of owners and users shall be registered;

32. Compensation for any loss of private property, such as built structures, crops and trees, and for the type of any use rights, shall be determined at the time of relocation and paid before relocation commences; Compensation shall be according to the market value of the land and the property, or the interest therein of the claimant at the valuation date. The assessment of compensation is by an independent evaluator appointed by the Local Council or the General Works Sub-Committee; and the relocated persons shall be assisted in restoring their livelihoods and standards of living.

3.5 World Bank Environmental, Health, and Safety General Guidelines

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). When one or more members of the World Bank Group are involved in a project, these EHS Guidelines are applied as required by their respective policies and standards. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. The General EHS Guidelines are organized as summarized in Box below.

Environmental	● Air Emissions and Ambient Air Quality ● Energy Conservation ● Wastewater and Ambient Water Quality ● Water Conservation ● Hazardous Materials Management ● Waste Management ● Noise ● Contaminated Land
Occupational Health and Safety	● General Facility Design and Operation ● Communication and Training ● Physical Hazards ● Chemical Hazards ● Biological Hazards ● Radiological Hazards ● Personal Protective Equipment (PPE) ● Special Hazard Environments ● Monitoring
Community Health and Safety	● Water Quality and Availability ● Structural Safety of Project Infrastructure ● Life and Fire Safety (L&FS ● Traffic Safety ● Transport of Hazardous Materials ● Disease Prevention ● Emergency Preparedness and Response
Construction and Decommissioning	● Environment ● Occupational Health & Safety ● Community Health & Safety

These General EHS Guidelines will be applied in addition to other guidelines as discussed in this chapter with the aim of mitigation various environmental and social impacts that are likely to be triggered by the Project.

3.6 Environmental, Health, and Safety Guidelines for Telecommunications

The EHS Guidelines for Telecommunications are applicable to telecommunications infrastructure such as fixed line and wireless voice and data transmission infrastructure, including long distance terrestrial and submarine cables (e.g. fiber optic cables), as well as radio and television broadcasting, and associated telecommunications and broadcasting installations and equipment. The guidelines are organized into Industry-Specific Impacts and Management and Performance Indicators and Monitoring.

The guidelines define key Environmental issues in telecommunications projects primarily include the following:

- Terrestrial habitat alteration
- Aquatic habitat alteration
- Visual impacts
- Hazardous materials and waste

- Electric and magnetic fields
- Emissions to air Noise

Occupational health and safety issues in telecommunications projects primarily include the following:

- Electrical safety
- Electromagnetic fields (occupational)
- Optical fiber safety
- Elevated and overhead work
- Fall protection
- Confined space entry ·
- Motor vehicle safety

Examples of community health and safety issues identified during the construction phase include exposure to construction vehicles and transports, and exposure to dust, noise and vibrations caused by constructions works. Operational phase occupational hazards associated with telecommunications projects include

- Structural and site access issues
- Aircraft navigation safety
- Driver safety and cellular phones

These General EHS Guidelines will be applied in addition to other guidelines as discussed in this chapter with the aim of mitigation various environmental and social impacts that are likely to be triggered by the Project.

3.7 World Bank Environmental and Social Standards (ESS)

The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting Shared prosperity

The Environmental and Social Standards set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens.

The World Bank's Environmental and Social Framework (ESF) requires the Bank and Borrowers to better manage environmental and social risks and impacts of projects and to improve development outcomes. EA-

RDIP is therefore subject to the World Bank ESF requirement. 9 of the 10 Environmental and Social Standards (ESSs) apply to the project. The ESS applicable to the project are

3.7.1 ESS1: Assessment and Management of Environmental and Social Risks and Impacts

Client's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

In order to meet this requirement, the borrower will: (a) Conduct an environmental and social assessment of the proposed project, including stakeholder engagement; (b) Undertake stakeholder engagement and disclose appropriate information in accordance with ESS10; (c) Develop an ESCP, and implement all measures and actions set out in the legal agreement including the ESCP; and (d) Conduct monitoring and reporting on the environmental and social performance of the project against the ESSs

The project ESCP has committed the government to prepare safeguard instruments with specific measures and actions over a specified timeframe to avoid, minimize, reduce or mitigate specific risks and impacts of the project. The government will not carry out any activities in relation to the project that may cause material adverse environmental or social risks or impacts until the relevant plans, measures or actions have been completed in accordance with the ESCP.

Further, the Bank has classified the proposed project as "High Risk" project in consideration on the type of project, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts associated with Environmental risks are primarily linked to a) alteration of terrestrial and aquatic habitats which could have adverse impacts especially if linear digital infrastructure may pass through critical habitats or biodiversity hotspots during construction periods and possibly during maintenance (sub-component 1.1,1.2).

The World Bank's ESS 1. Provides for the Environmental and Social Screening for each sub-activity under the project, the screening will provide that any linear digital infrastructure that could pass through critical habitats would be excluded as provided by the exclusion list (Annex 1). These screening forms are to be filled and reviewed by an environmental and social safeguards expert under the PIU at MICT. The safeguards expert will decide, on a case-by-case basis, whether an ESIA/ESMP or a standalone ESMP must be developed.

3.7.2 ESS2: Labour and Working Conditions

ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers.

The Borrower will develop and implement written labor management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS. The procedures will address the way in which this ESS will apply to different categories of project workers including direct workers, and the way in which the Borrower will require third parties to manage their workers in accordance with ESS2. ESS2 requires also a grievance redress system which allows workers to raise their grievances.

These will include, PIU's of the implementing institutions MICT including technical consultants supporting PIU from owners engineer and E&S firms, construction workers hired for the anticipated linear digital infrastructure installation of fixed line components, including shore approaches for long distance fiber optic cables, and access roads to transmission towers and other fixed infrastructure as detailed under component 1 and 2 of the Project. ESS2 also applied to community workers, however, EA-RDIP will not engage this category of workers as detailed in the Labour Management Plan prepared as a stand-alone document for the Project.

3.7.3 ESS 3: Resource Efficiency and Pollution Prevention and Management

ESS3 recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution1 prevention and management throughout the project life cycle
There are potential ESS 3 related risks with project activities under localized greenhouse gas emissions (sub-component 2.2) iv) Construction activities may also account for an increased demand for resources including water, energy and raw materials (sub-component 1.1,1.2) that may generate hazardous wastes and increase demand for water and energy. The ESMF should include sections on resource efficiency and pollution prevention and management. Assessment of risks and impacts and proposed mitigation measures related to relevant requirements of ESS3, including raw materials, water use, air pollution, hazardous materials, and hazardous waste are included within scope of the ESMF, and ESMPs as relevant.

3.7.4 ESS4: Community Health and Safety

ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. The project is expected to result in health and safety impacts to the community in the project area, such as impacts associated to exposure to dust, noise and vibration, e waste hazards

ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. While not explicitly

mentioned, prevention and mitigation of different forms of gender-based violence, specifically Sexual Exploitation and Abuse, is being covered by ESS4.

Construction activities may also account for an increased occupational health and safety issues (sub-component 1.1,1.2) within communities. Further, the project will lead to increased traffic movements, the impacts are expected to be moderate, and there is the likelihood for traffic congestion at the onset of construction activities, while the material is being transported, the impact will be significant in urban centres and may directly impact communities.

The project may engage international contractors and experts as well as establishment of contractor's camp in the project area during construction activities. While it is expected that the contractor comes with a team of skilled personnel to carry out the specialized tasks such as laying out the digital infrastructure, local contractors, service providers, unskilled or semi- skilled workers may be required. This labor influx is expected to subside after the completion of the civil works. Nevertheless, labor influx associated with disposable income may increase the risk of exposing the communities to transmissible infections, GBV/SEAH cases, HIV/AIDS and COVID 19.

Conflict and insecurity remain persistent challenges in Somaliland and have, in the past, impeded delivery of projects. Ensuring security for project operations amid armed groups in a region with a recent history of relative lawlessness and the potential for increased conflict due to the drought, will remain a significant challenge. This general insecurity may impact to all projects listed under component 1 and 2. In addition, the project planning and implementation will require deployment of security personnel for the protection of project workers and equipment, the presence of security services in the project area can pose a threat to the community through violence, exploitation and abuse. The government will be guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security workers. Further, Security Risk Assessment Management Framework has been prepared to address security risks in relation to project implementation.

The project will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. Due diligence will be done to ensure the hires security firm are (i) not implicated in past abuses; (ii) adequately trained (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities; and (iii) compliance with the applicable law and any requirements set out in the ESCP.

3.7.5 ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The overall objectives of the World Bank's ESS 5. Are to avoid land acquisition and involuntary resettlement where feasible, or to minimize resettlement while exploring all viable alternatives. Where it is not possible to avoid resettlement, activities will be conceived and executed as sustainable development programs, providing sufficient investment to enable the persons displaced by the project to share in the project benefits.

The project activities will lead to potential land acquisition of land and potentially physical and/or economic resettlement which may differentially affect vulnerable groups, ESS7 communities, those with smaller land

plots or informal rights to land use due to deployment of digital infrastructure (sub-component 1.1). The project may need to manage legacy around unsettled/multiple claims to land and assets proposed for sub project level investments inside or outside the existing facilities occupied by private or public service providers. While some municipalities have some form of land administrations and tenure systems in the cities, Land administration and management is fragmented and non-existent in most part of Somaliland. The country currently does not have a national land acquisition law, land tenure is likely to remain more collective than individual in nature, particularly in rural areas.

When compared to requirement of ESS 5, the Government of Somaliland has inadequacies around consultation requirements, eligibility for compensation, valuation method, grievance redress mechanism, disclosure of information and the timing of compensation payments. Hence, the Bank's ESS5 will take precedence over GOVERMENT laws. Compounded by gaps in legal and regulatory frameworks, compensation requirements for affected assets, land appropriation and asset valuation will be very challenging. Stakeholder consultation will be fundamental in relation to the required land take. Community heads, clan leaders, local government leaders and PAPs should be timely consulted to enable them rally support for the project activities and to agree not only on compensation modalities, but also on who is to be compensated

3.7.6 ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources,

ESS6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. As discussed in ESS1, screening will provide that any linear digital infrastructure that could pass through critical habitats would be excluded as provided by the exclusion list (Annex 1). ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. This ESS also addresses sustainable management of primary production and harvesting of living natural resources. ESS6 recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples, who’s access to, or use of, biodiversity or living natural resources may be affected by a project.

The World Bank's ESS 1. Provides for the Environmental and Social Screening for each sub-activity under the project, the screening will provide that any linear digital infrastructure that could pass through critical habitats would be excluded as provided by the exclusion list (Annex 1

The installation of fixed line components, including shore approaches for long distance fiber optic cables, and access roads to transmission towers and other fixed infrastructure, may require construction of corridors crossing aquatic habitats with the potential to disrupt watercourses, wetlands, coral reefs, and riparian vegetation (sub-component 1.1,1.2) to be restricted to urban areas where there are major load centers, existing road, energy corridors or Way Leave/ROW and within mini grids existing footprint and therefore impacts on natural and sensitive habitats is expected to be limited.

ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. Habitat is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the non-living environment.

All habitats support complexities of living organisms and vary in terms of species diversity abundance and importance.

This ESS also addresses sustainable management of primary production and harvesting of living natural resources. ESS6 recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples, who's access to, or use of, biodiversity or living natural resources may be affected by a project. The potential, positive role of project affected parties, including Indigenous Peoples, in biodiversity conservation and sustainable management of living natural resources is also considered.

3.7.7 ESS7 Sub-Saharan Historically Underserved Traditional Local Communities

This ESS applies to a distinct social and cultural group identified in accordance with paragraphs 8 and 9 of this ESS. There are no communities identified so far meeting the requirements of ESS7 in Somaliland, however the application of ESS7 will be analyzed (included in the ESMP) and a commitment to consult experts and potentially affected groups and to prepare an IPPF. IPPF will be prepared if there is a likelihood that SSAHUTLCs can be found in, or have collective attachment to, project areas or nearby. At this stage, the individual subprojects and project areas are not known. The application of ESS7 will also be analyzed further through a bank led due diligence led by experts and consultation with potentially affected groups during project implementation phase. Further, screening that will be conducted early on will help determine if there are any groups fitting under ESS7 are present in any of the sub-project's area, if so, appropriate instrument such as an Indigenous People Plan (IPP) will be developed.

3.7.8 ESS8: Cultural Heritage

This ESS recognizes that cultural heritage, in its many manifestations, is important as a sourced of valuable scientific and historical information, as an economic and social asset for development, and as an integral part of people‘s cultural identity and practice. The objective of this ESS is to protect cultural heritage from the adverse risks and impacts of project activities and to promote meaningful consultations with stakeholders regarding cultural heritage.
The Borrower will implement globally recognized practices for field-based study, documentation and protection of cultural heritage in connection with the project, including by contractors and other third parties.

A chance finds procedure is a project-specific procedure which will be followed if previously unknown cultural heritage is encountered during project activities. It will be included in all contracts relating to construction of the project, including excavations, demolition, movement of earth, flooding or other changes in the physical environment. The chance finds procedure will set out how chance finds associated with the project will be managed.

The procedure will include a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence-off the area of finds or sites to avoid further disturbance; to assess found objects or sites by cultural heritage experts; to identify and implement actions consistent with the requirements of this ESS and national law; and to train project personnel and project workers on chance find procedures. This ESMF also includes a set of Guidelines for the Protection of Cultural Heritage Sites that covers ‘known sites’, and ‘unknown sites’ plus procedures for ‘chance finds’, as can be found in Annex II.

3.7.9 ESS10: Stakeholder Engagement and Information Disclosure

ESS 10 applies as it addresses the importance of open and transparent stakeholder engagement, which is essential in improving the environmental and social sustainability of the project. Stakeholder engagement must be a socially inclusive process conducted throughout the project life cycle.

Where properly designed and implemented, it supports the development of strong, constructive responsive relationships that are important for the successful management of a project’s environmental and social risks. Construction and rehabilitation of electricity infrastructure will impact the social and economic life of people and their environment. For any such project to be sustainable, stakeholder engagement has to be conducted throughout the life cycle of the project.

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project’s environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project’s environmental and social risks and impacts.

In consultation with the Bank, the Borrower will develop and implement a Stakeholder Engagement Framework (SEF) proportionate to the nature and scale of the project and its potential risks and impacts. The

SEF also outlines the establishment of a functioning grievance redress mechanism. Stakeholder Engagement was held on 12th and 13th November 2022, has been documented under Stakeholder Engagement Plan (SEP) which is presented separately as part of ESF instruments. However, more consultation will be done throughout the project operational period in line with the draft SEP for the project

3.7.10 Legal Gap Analysis

The activities under EA-RDIP will comply with both Somaliland laws and regulations and World Bank Environmental and Social Standards. This sub-section compares the national public sector environmental management rules, regulations and standards with the World Bank Group Environment and Social framework. The objective of the gap analysis is to understand whether the WB's ESSs or the relevant national laws and regulations apply to the project; this gap analysis is to help implement environment and social standards more effectively at the state level through an understanding of existing gaps and provide gap filling measures appropriately. **Table 3-1** below summarizes a comparison focusing on the World Bank Environment and Social Standards relevant to the project and gaps identified in existing Somaliland laws and regulation.

Table 3-1: GAP analysis for WB and Somaliland Polices, Laws & regulations relevant to this ESMF

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts			
Objectives of ESS 1 are: To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs. To adopt a mitigation hierarchy approach to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigated; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible. To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project. To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate. To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.	The Constitution of The Republic of Somaliland 2001 Article 12 (4) of the Constitution of The Republic of Somaliland concerning the appropriate utilization of the natural resources of the country whose management is exclusively assigned to the central government of Somaliland. And Article 18 (1) of the Constitution which requires the state to give special priority to the protection and safeguarding of the environment <u>Somaliland Environmental Management Act (SEMA) 2014</u> Article 23 provides that Environmental impact assessment must be carried out by a competent person(s) or institution before carrying development Projects	Enforcement of Somaliland Environment Management still is not established and the Act (SEMA) 2014 provisions requires enhancement through provisions such as inspection and prosecution powers, this can be achieved through drafting of specific regulations to be endorsed by the Minister for ME&RD	This ESMF lays out a screening process of all sub projects and activities in order to assess whether activities require environmental and social assessments. Site-specific instruments such as Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP) and Resettlement Action Plan (RAP) reports to be prepared at later phases of the project.

ESS 2: Labor and Working Conditions			
The Objectives of ESS 2 are: To promote safety and health at work. To promote the fair treatment, non-discrimination and equal opportunity of project workers. To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. To prevent the use of all forms of forced labor and child labor. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. To provide project workers with accessible means to raise workplace concerns.	Article 20 of Somaliland Constitution of 2001 focused on Work, Trade, and the Welfare of Employees provides that All employees have a right to payment appropriate to the work they undertake, and are free to enter into agreements with their employers on an individual or collective basis. Forced labour is prohibited. <u>Provisional Constitution of Somaliland.</u> Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose**.** <u>Provisional Constitution Somaliland Article 19: The Care of the Vulnerable of the Society.</u> They shall be responsible for the health, care, development and education of the mother, the child, the disabled who have no one to care for them, and the mentally handicapped persons who are not able and have no one to care for them.	Enforcement of Labour (Amendments & Additions) Law, No. 31/2020 provisions requires enhancement such as provisions for inspection and enforcement. -The new Somaliland labor code has been passed by the Somaliland parliament. -The implementation of the existing articles in practice may not be very strong -A legislation in Somaliland prohibiting FGM have been drafted. The Somaliland Sexual Offences bill is not yet passed.	The Project will not allow any forced and child labor. It will hold all contractors liable to the implementation of the LMP which will be developed once the project becomes effective. will have overall responsibility to monitor the implementation of the LMP The LMP will spell out a workers' grievance redress mechanism; and the GBV Action Plan provides referral pathways for cases of GBV.

	Labour (Amendments & Additions) Law, No. 31/2020 establishes established labour directorate office that has responsibility of care to all category of workers		The LMP spells out a workers' grievance redress mechanism; and the GBV Action Plan provides referral pathways for cases of GBV (see annex 4)
	Labour (Amendments & Additions) Law, No. 31/2020 stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre- approval. Somaliland Private Law. 31/2020 Somaliland private law declared all working conditions and health and safety procedures		The Project will fully comply with WB ESS 2. This is set out in the LMP (See LMP presented separately as part of the ESMF)
	Somaliland Private Law. 31/2020 The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association.	Children are deployed in worst forms of child labor (forced recruitment by army, forced labor in domestic work, agriculture and herding, breaking rocks for gravel, construction work, commercial sexual exploitations)	

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	Workers are allowed to join trade union. <u>Provisional Constitution Somaliland</u> Article 17**:** Health: In order to fulfil a policy of promoting public health, the shall have the duty to meet the country's needs for equipment to combat communicable diseases, the provision of free medicine, and the care of the public welfare. Provisional Constitution Somaliland Somaliland Labour/Employment Law has the provision(s) that addresses workers' grievance mechanism on Chapter 10: Employees' grievances Somaliland Labour/Employment Law: Chapter 11: Health and safety in the work place.	However, Somaliland made efforts to construct a rehabilitation center for former child combatants and establish a Human Trafficking and Smuggling Task Force. Children are further deployed in agriculture (farming, herding livestock, fishing); industry (construction, mining and quarrying); services (street work, working as maids in hotels, domestic work, voluntary recruitment of children by army); children also perform dangerous tasks in street work Laws do not identify hazardous occupations or activities prohibited for children, and child trafficking for labor and commercial sexual exploitation is not criminally prohibited. Government does not employ labor inspectors and conducts no inspections.	The Project will apply occupational health and safety management system that is consistent with the WBG General Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety The LMP to be developed will set out a workers' grievance redress mechanism

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ESS 3: Resource Efficiency and Pollution Prevention and Management			
The Objectives of ESS 3 are: To promote the sustainable use of resources, including energy, water and raw materials. To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. To avoid or minimize project-related emissions of short and long-lived climate pollutants.	The Constitution of The Republic of Somaliland 2001 Article 12 (4) of the Constitution of The Republic of Somaliland concerning the appropriate utilization of the natural resources of the country whose management is exclusively assigned to the central government of Somaliland. - Article 17 Health: Ensures the promotion and the extension of healthcare and private health centers. In order to fulfil a policy of promoting public health, the state shall have the duty to meet the country's needs for equipment to combat communicable diseases, the provision of free medicine, and the care of the public welfare.	Enforcement of Somaliland Environment Management Act (SEMA) 2014 provisions requires enhancement through provisions such as inspection and prosecution powers, this can be achieved through drafting of specific regulations to be endorsed by the Minister for ME&RD	The Project will promote the sustainable use of resources and avoid or minimize adverse impacts on human health according to the Constitution and the WB's ESS3. General measures are laid out in this ESMF and specific measures will be established in subproject specific ESMPs.

To avoid or minimize generation of hazardous and non-hazardous waste.	The Constitution of the Republic of Somaliland Article 18 of the Constitution states that every Somaliland has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somaliland citizen has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources. Somaliland Environmental Management Act (SEMA) 2014 Article 23 provides that Environmental impact assessment must be carried out by a competent person(s) or institution before carrying development Projects		
ESS 4: Community Health and Safety			
The Objectives of ESS 4 are: To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances.	The Somali Penal Code of 1962. The Code criminalizes rape and other forms of sexual violence as well as forced prostitution. Arts 398-9 provide that 'carnal intercourse' and 'acts of lust omitted with violence' are punishable with 5-15 years and	Rape, fornication and other related offences bill- law no. 78/2020- Somaliland fails to protect survivors and prosecute perpetrators.	A GBV/SEAH Response Plan will be prepared, consulted upon, approved and implemented. The Project will also implement a Security Management Plan, and activity-specific ESMPs as required for other community health and safety risks.

To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. To have in place effective measures to address emergency events. To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities. To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams	1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401. Art 39(i) makes abuse of power in the commission of a crime an aggravating circumstance and Art 33 provides that when a superior officer orders the commission of an offence both the perpetrator and his superior will be liable. Rape, fornication and other related offences bill- law no. 78/2020- Somaliland Article 11 of the Act address Sexual Harassment and Assault, it provides that "Any mature and mentally sane individual who inappropriately touches a person other than their spouse, or compels a person to touch him/her inappropriately, or forces a person to touch another person inappropriately, has committed a criminal act of unwelcome sexual advances and inappropriate touching and is liable to a penalty of 1-3 years of imprisonment. If the criminal act stated in Paragraph 1 of this Article, is	The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and gender-based violence. Furthermore, in practice however it has been documented that women complaining about a rape may find themselves trapped by the Art 426 prohibition against adultery that makes no exception for the case of rape. In practice provisions under Art 39(i) offer little more than theoretical protection Art. 405-408. Prostitution is prohibited. Human trafficking: No comprehensive law on the issue.	Several measures will be undertaken, including contractors will develop road safety management plan and a Health and Safety Plan as part of the CESMP to address the impacts on local communities of moving construction equipment; measures and actions developed to assess and manage specific risks and impacts outlined in the ESMF and subsequent ESMPs.

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	committed against a minor, or a vulnerable person, the offender will be liable to 3-5 years of imprisonment". The law does not provide any details on legal age of a minor in Somaliland or sex consent.		
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
The Objectives of ESS 5 are: To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives. To avoid forced eviction. To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by providing timely compensation for loss of assets at replacement	The Constitution of the Republic of Somaliland Art 26 states that every person has the right to own, use, enjoy, sell and transfer property. The State may compulsorily acquire property only if doing so is in the public interest. Any person whose property has been acquired in the name of the public interest has the right to just compensation from the State as agreed by the parties or decided by a court. The Agricultural Land Law (1975). The law transfers all land from traditional authorities to the government. Individuals desiring land were to register their holdings within a 6 month period. The law does not recognize customary land holdings.	There is a lack of detailed legislation governing land use and ownership and acquisition. Evictions are reported to be commonplace in Somaliland. ESS5 recognizes three categories of Project Affected Persons, which are eligible for compensation: 1. Those with formal legal rights to land (including customary and traditional rights recognized under the laws of the country). 2.Those who do not have formal legal rights to land at the time of census, but have a claim that is recognized under the laws of the country 3. Those who have no recognizable legal right or claim to the land they are occupying. 4. Those without legal title to land, including squatters and	Where land is donated by private owners, a land donation agreement process is implemented. Where land is acquired by eminent domain, RAPs would be produced. A Resettlement Policy Framework (RPF) will guide the development of site- specific RAPs once the project footprint is known (RPF is presented separately as part of this ESMF) The RPF follows ESS 5 guidelines.

		encroachers, are eligible for only limited protection under Somali laws and policies ESS5 further defines types of losses to be compensated to include physical and economic displacements and cover land, residential or commercial structures, and lost income caused by temporary or permanent economic displacement. While under Art 26, people have a right to be compensated, it is not clear how the amount for the compensation is determined. ESS5 requires full replacement costs for all assets. Somali law does not determine compensation schedule and cut-off date. ESS5 determines that improvements of the living situations of displaced vulnerable people should be undertaken, Somali Law does not provide for that. No meaningful consultations with project affected persons may take place, consultation mechanisms seem to make a	

		preference in regards to governmental bodies rather than community stakeholders. The Agricultural Land Law led to disparities between statutory tenure and actual land use and allocation.	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
The Objectives of ESS 6 are: To protect and conserve biodiversity and habitats. To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources. To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities	The Constitution of the Republic of Somaliland Article 18 of the Constitution states that every Somali land citizen has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. The constitution of the Republic of Somaliland Article 18 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. Furthermore, all people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment.	Apart from broad constitutional provisions there is not detailed laws that govern biodiversity conservation and sustainable management of living natural resources at this point.	The Project will avoid any encroachment into any modified, natural, critical habitat and/or protected areas, this will be achieved through screening prior to intervention. Measures and actions developed to assess and manage subproject specific biodiversity risks and impacts as outlined in the ESMF and subsequent subproject ESMPs.

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ESS 8: Cultural Heritage			
The Objectives of ESS 8 are: To protect cultural heritage from the adverse impacts of 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 use of cultural heritage.	Article 16: Promotion of Knowledge, Literature, Arts and Culture provides that the state shall promote the Arts and the modest culture of the society whilst at the same time Benefiting from the knowledge of other world societies. Literature, the arts, and indigenous sports shall be specially encouraged whilst Islamic behaviour is observed	Further laws and regulation should be enacted to further regulate matters related to cultural heritage	The Project will implement chance find procedures to protect cultural or archaeological findings during project activities, as per Chance Find Procedure in annex 2. The Project will further conduct community consultations (as per SEP) prior to project activities in order to ensure protection of other tangible and
ESS 10: Stakeholder Engagement and Information Disclosure			
The Objectives of ESS 10 are: To establish a systematic approach to Stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance. To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.	The Constitution of The Republic of Somaliland 2001 does not provide any provision on citizen right to access information	Legal gap exists on legislations on right of citizen to access information from the state	The Project will implement stakeholder consultations throughout the lifetime of the project, as per the SEP and Information Disclosure provisions in the SEP/ESS 10 The PIU will ensure that a grievance mechanism for the project is in place, in accordance withESS10 as early as possible in project development to address concerns from project affected persons

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To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.			

4 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

4.1 Environment and Social Risks

This chapter identifies generic potential environmental and social risks and impacts associated with the implementation of the ER-RDIP project and provides mitigation measures in line with the mitigation hierarchy provided in the ESF. The potential for occurrence of the impacts identified has to be ascertained during further stages of project design, construction and implementation. **Table 4-1 to 4.3** gives the details of the subcomponent activities to give the highlight of the potential environmental and social risks associated with the project.

Table 4-1: Details of the Project Component 1 and Potential Environment and Social Risks

Sub Component and Interventions under Component 1	Risks
Sub-component 1.1: Cross-border and backbone network connectivity. **Interventions** Deployment of up to 4,600 km of new fiber along prioritized routes including connecting three main cable landing stations (Mogadishu, Bossaso, and Berbera) and connecting to cross-border links to Kenya, Ethiopia	**Environment** a. Alteration of terrestrial and aquatic habitats which could have adverse impacts especially if linear digital infrastructure may pass through critical habitats or biodiversity hotspots during construction periods and possibly during maintenance, including the destruction of breeding grounds of critically endangered fauna. Therefore, to avoid this risks annex 1 provides an exclusion list whereby if a critical habitat or any other parameters discussed in the exclusion list are found, then re-routing will be done. b. Soil pollution following the route site preparation works, site development and deforestation and clearing; opening of access roads (earthworks); earth compaction, creation of ruts by the repeated passing of machinery and workers during the works preparation phase; spillage of oil, gasoline or other pollutants that could impact soil quality. c. The installation of fixed line components, including shore approaches for long distance fiber optic cables, and access roads to transmission towers and other fixed infrastructure, may require construction of corridors crossing aquatic habitats with the potential to disrupt watercourses, wetlands, coral reefs, and riparian vegetation d. Construction and electronic wastes generated from general construction activities and installations, including air pollution risks e. Construction activities may also account for an increased demand for resources including water, energy and raw materials. Deterioration of the quality of surface water, which could be caused by accidental spillage of fuel and oils from machinery during the works phase and disruption of the hydraulic systems of water courses.
Sub-component 1.2: Last mile connectivity including in borderland areas **Interventions** Activities will involve connecting population centers, public institutions along the fiber route and establishing low-cost portable, emergency response options of Wi-Fi hotspots, nomadic RANs, network transceivers in host communities and IDP/refugees camps in borderland areas	

Sub Component and Interventions under Component 1	Risks
	f. Occupational health and safety issues to workers and community installing the fiber and last mile connectivity cables. **Social** 2. Acquisition of land and potentially physical and/or economic resettlement which may differentially affect vulnerable groups ESS7 communities, those with smaller land plots or informal rights to land use due to deployment of digital infrastructure 3. Construction of infrastructure resulting in labour influx which may impact community health and safety including transmission of diseases (including STIs and Covid-19), conflict between workers and the community as well as risks associated with sexual exploitation and abuse and sexual harassment (SEA/SH) 4. Risks to project workers, and the risk of using of security personnel on work sites **5.** Risks to labour including the potential use of child or forced labour by contractors or in the supply chain **6.** Cultural Heritage risks associated with project interfering with critical cultural heritage sites
Sub-component 1.3: Enabling legal, regulatory and institutional ICT environment **Interventions** Technical assistance (TA) will be provided to strengthen the institutional capacity of MICT and boost the regulatory maturity of the NCA to effectively spearhead the connectivity agenda and universal services targets through the development of new policy and regulatory instruments	EHS risks due to technical assistance activities to be financed by the project such as legal, policy and regulatory frameworks

Table 4-2: Details of the Project Component 2 and Potential Environment and Social Risks

Sub Component and Interventions under Component 2	Risks
Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity **Interventions** Support will build-on cybersecurity activities previously supported under 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	**Environment** Localized greenhouse gas emissions from digital infrastructure and e-waste and OSH risks during construction of the masts. **Social** a. b. Social risks related to land acquisition, loss of revenues for communities, impacts on the crops, EHS risks due to technical assistance

Sub Component and Interventions under Component 2	Risks
Sub-component 2.2: Data exchange, governance and protection **Interventions** 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	activities to be financed by the project such as legal, policy and regulatory frameworks c. Cultural Heritage risks associated with project interfering with critical cultural heritage sites
Sub-component 3.1: Digital cross-border trade, payment and service enablers. **Interventions** To support the creation of the 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	

Table 4-3: Details of the Project Component 3 and Potential Environment and Social Risks

Sub Component and Interventions under Component 3	Risks
Sub-component 3.1: Digital cross-border trade, payment and service enablers. **Interventions** To support the creation of the 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	EHS downstream risks due to activities triggered by technical assistance to be financed by the project such as legal, policy and regulatory frameworks Significant security risks
Sub-component 3.2: Regional research and education networks (RENs), and training for digital skills. **Interventions** To strengthen the higher educational network through the REN and integration with regional RENs allowing for network economies and knowledge transfer	

4.2 Identification of Potential Environmental and Social Risks and Impacts

Positive Impacts

The objective of this section is to aid PIUs and other institutions responsible for implementing this ESMF, to identify, evaluate and manage the environmental and social risks and impacts of the project and consequent activities in a manner consistent with the applicable ESSs. The impact identification and assessment are based on potential impacts from anticipated project activities. Site specific project impacts would be detailed for each sub project environment and social assessment, before the commencement of activities as part of the Environmental and Social Management Plan (ESMP) implementation to be prepared

by PIUs; through procurement of professional environmental and social safeguards services from qualified and experienced Consultant's. The potential positive impacts include but not limited to the ones listed in **Table 4.4** below:

Table 4-4: Project Positive Impacts

Components	Positive Impacts / Outputs
Component 1: Connectivity market development and integration	● Increased population covered by 3G network ● Additional fiber optic cables deployed ● Additional internet access points established including borderland areas (connected government offices, refugee camps, schools, hospitals, agriculture cooperatives) ● Guidelines for greening digital infrastructure including leveraging renewable energy resources and e waste management adopted ● Private sector resources mobilized under the Project
Component 2: Data market development and integration	● National or / and Sectoral Computer Emergency Team (CERP) operational ● Regional and National Cyber Security Standards compliance and audit framework developed ● Internet exchange points established ● Guidelines on cloud computing and options for government data hosting and regional and national level formulated ● Regional mechanisms procedures and agreements for cross border data flows established
Component 3: E-service market development and integration	● Regional and national e-commerce strategy and / or protocols established ● Business participating in workshops on adoption of e-commerce ● Regional guidelines on harmonization and interoperability of payment systems issued ● Preparation of government enterprise architecture and interoperability framework for government IT infrastructure ● National digital skills training institute operationalized ● University and TVET institutes connected to high speed internet

Adverse Risks

The potential adverse environmental and social Risks of EA-RDIP activities are envisaged to be localized to some extent in spatial extent, short in duration and can be manageable through the implementation of appropriate mitigation measures for example dust emission, labour influx at temporal camp site among others. However, some of the potential impacts and risks particularly related to pollution, biodiversity impacts, and land acquisition could be significant long term and/or permanent including risks related to labor influx and GBV. Impact identification and assessment starts with scoping and continues through a structured impact assessment process. The principal steps comprise the following steps.

ESMF includes a negative list of the environmental and social screening form (See Annex I) as well as potential impacts and risks of physical interventions. The objective as provided by ESS1 is to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigate; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

The mitigation measures outlined below are not intended to be exhaustive in content but rather to indicate in general to the scope of ESIAs and ESMPs. It is entirely possible that additional impacts will be identified during impact assessment studies or audit preparation and will require additional mitigation measures. In the ESIAs and ESMPs, impacts shall be categorized according to project phase (planning, construction, operation, and decommissioning) and for all project types.

The environmental management program should be carried out as an integrated part of the project planning and execution. It must not be seen merely as an activity limited to monitoring and regulating activities against a pre- determined checklist of required actions. Rather it must interact dynamically as a subproject implementation proceeds, dealing flexibly with environmental impacts, both expected and unexpected. For all subprojects to be implemented under EA-RDIP, the ESMP should be a part of the Contract Document.

Pre-construction Phase:

The risks associated with the proposed infrastructure, include the potential land issues and resettlement, security issues, underlying social tensions, marginalization of certain groups in access to digital infrastructure, and societal GBV risks. This phase also involves the landing of procured commodities for EA-RDIP at shipping docks/yards and international airports in Somaliland, and their temporary storage at these facilities prior to supply/transportation to selected warehouses. The safeguards team at the PIU and PIU at large will be responsible in the managing of the E&S risks alongside the line ministries.

Workers Camps: Workers' accommodation processes and standards GUIDANCE NOTE of IFC and European Bank addresses the processes and standards that should be applied to the provision of workers' accommodation in relation to projects funded by the EBRD or IFC. There is a range of different types of workers' accommodation that may be required by various projects and at different stages within projects, including temporary exploration camps, construction camps and permanent dormitories. Specific issues arise in relation to each of these. At the initial stage of EA-RDIP PIUs will assess whether accommodation for workers is required, and if so, whether this can be provided within existing local communities or whether new facilities should be constructed. The likely impact on local communities and the housing market of either option should be assessed. The following measures will be addressed and monitoring by the PIU.

- Before constructing any workers facilities, other potential impacts will be evaluated by the PIU. These may include the impact of construction, and the effect of a new housed labour force on community services, such as health, and on community cohesion and safety. These assessments will form part of a project's Environmental and Social Impact Assessment.
- The next step is to consider the standards to be applied for the location, arrangement and construction of any workers facilities. Issues here to comply with include consideration of a safe and healthy location, application of appropriate construction standards, provision of adequate and sanitary living conditions and provision of appropriate leisure and health facilities.
- Also, when the accommodation has been completed, there are issues around its operation and management which the PIU will monitor and ensure compliance. These include the type of staff who will manage it, development of appropriate management policies, such as security and grievance procedures, and ongoing liaison with local communities.

Table 4-5: Potential Environmental and Social Risks and Impacts Associated with Pre-Construction Phase

Table 4-5: Pre-Construction Phase Risks: Component 1 and 2

Impact / Risks	Mitigation Measure
Social risks	
Land Acquisition and resettlement resulting to Loss of accruing benefits of owning land including potential loss of livelihoods	**As provided by ESS5** ● Compensation in cash at full replacement value in line with the RAP developed and livelihood assistance, also in-kind compensation will be accepted. ● Be provided with similar property that is equal in value and size to the said property, ● Where land use is partially affected or with temporary losses, replacement value will be determined for 'loss of use of land' and for temporary losses in line with the project RAP, ● Stakeholder engagement of the PAPs, and Timely disclosure of project information.
Delays in compensation for land take due to land tenure and clan dynamics	**As provided by ESS5,** ● Follow provisions of the RPF and RAPs prepared for the project ● Engagement with the parties involved in the conflict, ● Opening an ESCROW account and depositing the compensation money, as dispute is being solved,
Forced displacement of IDPs by the government to provide land for the sub projects; many IDPs are temporarily occupying public or communally used t land within the main cities and towns	**As provided by ESS5** ● Follow provisions of the RPF and RAPs prepared for the project ● Compensation in cash at full replacement value for Assets in line with the RAP, ● Compensation for the replacement value for 'loss of use of land' and for temporary losses in line with the project RAP, and ● Setting additional measures relating to livelihood improvement or restoration.

<u>Construction Phase:</u>

Table 4-6 below identifies the potential environmental and social risks and impacts describes the mitigation and enhancement measures that could be applied to the subprojects under EA-DRIP during operation stage. The safeguards team for the contractor with supervision of the PIU safeguards team will be responsible for the managing of the E & S risks and impacts.

Table 4-6:: **Construction Phase Environment Risks: Component 1 and 2**

Environmental Impact	Mitigation Measures
Impacts on Soil Resources within areas near the fiber routes and sites for digital masts Project activities related to laying of deployment of new fiber along prioritized routes,	**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 project site area,

Environmental Impact	Mitigation Measures
plant and equipment could interfere with soil structure and soil microbial biomass communities, making soil resources susceptible to erosion and losing their fertility, further plant and equipment could pollute soil resources	● 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 ●
Impact on Water Resources in within areas near the fiber routes and sites for digital masts Alteration of terrestrial and aquatic habitats which could have adverse impacts especially if linear digital infrastructure may pass through critical habitats or biodiversity hotspots during construction periods and possibly during maintenance	**As provided by ESS3** ● Discharge of grey water or uncontrolled discharges from the site/working areas (including wash down areas) to adjacent rivers shall not be permitted; ● Contractor should sensitize workers on water conservation and put strict measures to avoid wastage of water, ● Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from vehicles. Hazardous waste should be contained and properly disposed by licensed hazardous waste handlers. ● Water containing pollutants such as cements, concrete, lime, chemicals and fuels shall be discharged into a conservancy tank for planned removal from site ● Works that are likely to generate silt-laden runoff such excavations will be undertaken preferentially during the drier months of the year; December-March ● The drainage system will be developed to prevent silt-laden run-off from entering surface water drains and streams without

Environmental Impact	Mitigation Measures
	treatment (e.g. earth bunds, silt fences, straw bales, or proprietary treatment) under any circumstances ● Where possible an 8m buffer strip of existing vegetation will be maintained within the project site. ● Earth stockpiles will be seeded as soon as possible, covered with geotextile mats or surrounded by a bund to minimize the risk of sediment-rich run-off ● Tools and plant will be cleaned in designated areas within the site where run-off can be isolated for treatment before discharge to the river or nearby water resources; ● Debris and other material will be prevented from entering watercourses; Construction sites (such as settlement lagoons or other temporary attenuation) to be used during construction if necessary; Diversion of minor watercourses will be carefully managed to prevent suspension of silt (or contamination by other pollutants) ● Discharge into watercourses and water bodies will only be carried out under consent of the relevant governing bodies ● All domestic wastewater from workers camp sites which may be contaminated with oily substances must be managed in accordance with an appropriate Waste Management Plan (WMP) ● Hydrocarbon-contaminated water shall not be discharged into the environment; ● At construction stage, the contractor will prepare Specific Construction Environment and Social Management Plan (C-ESMP) which included among others: Spoil Management Control Plan, health and safety management plan and Waste Management Plan.
Impacts on Air Quality to Communities and workers Impact to health of Communities and Workers working on infrastructure projects **under component 1 and 2**	**As provided by ESS4** ● Develop and implement a Dust Management Plan (DMP) and Undertake 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

Environmental Impact	Mitigation Measures
	● 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 minimize dust blow.
Noise and Vibrations Impacts to Communities and workers	**As provided by ESS4** ● Compliance with ambient noise standards in General EHSG. ● 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.
Impact on Flora and Fauna on critical habitats and sensitive receptors such as the mangrove at the coastline	**As provided by ESS6** ● Ensure proper demarcation and delineation of the project area to be affected by construction works; ● Where possible, avoid clearing the vegetation, including by selecting alternative alignments and locations to avoid sensitive areas and natural habitats.; ● 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

Environmental Impact	Mitigation Measures
	● 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, stockpiling of materials etc. 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 and pioneer camps (if present) should be done as swiftly as possible and always with suitable native grasses and other plants

Table 4-7: Construction Phase Occupational Health and Safety Risks

Social Impact / Health and Safety Impacts	Proposed Mitigation Measures
Risk of Accidents and Occupational Safety and Health Concerns during civil works under the EA-RDIP	● **As provided by ESS2** To reduce on the workers accidents and hazards, Contractor will develop and monitor implementation of an occupation Health and Safety Management Plan (OHSMP) which will include the following measures: Plan should be consistent with good international practice as exemplified in General and Telecommunication EHSG. ● Contractor shall restrict access to active construction sites, including establishment of a fence to hoard the area under construction, ● Workers will be provided with suitable PPE including: to avoid cuts on the feet, hands and head during the course of duty. This include helmets, gloves, safety boots overalls, face masks and ear plug in dusty and noise activities; ● Provision of adequate sanitary facilities to workers separate for either gender. ● Train all workers on Safety Health and Environment (SHE) with an aim of improving awareness; ● The workers or their representatives will be trained on first aid and provided with first aid kits; ● Ensure all vehicles, equipment and machines are inspected, repaired and maintained before use, and machine operators are trained on machine use and safety; ● Ensure all the electrical works are carried out by trained professionals; ● Implement a workers grievance redress mechanism to allow workers raise safety issues and propose improvements on site; ● Trenches over 1.5m deep will be secured against accidental entry by workers and the public using barriers and warning tapes. ● The contractor will install appropriate safety signage at the work areas to warn learners/staff from coming close to the construction site, ● Emergencies: the workers should be provided with emergency telephone numbers to request for assistance at any time of accident ● Where construction activities interfere with the movement of traffic, appropriate signage will be installed and controlled by trained flagmen/flag women and lit by night. ● Provision of serviceable fire extinguishers on site and well-equipped first aid kit ● Public awareness/Training for first aid providers
Community health and safety risks resulting from during civil works under the EA-RDIP	**As provided by ESS4** ● To reduce on the community accidents and hazards, contractor will develop and monitor implementation of a Community Health and Safety Management Plan (CHSMP) ● Notify the public on ongoing works through appropriate publicly accessible sites at the school ● Sensitize the learners on the health and safety risks and mitigation measures related to the construction activities, ● Contractors should work closely with the school administration to find ways to minimize temporal disruption of services ● Restrict access to active construction sites including screening off/ barricading the active work area,

Social Impact / Health and Safety Impacts	Proposed Mitigation Measures
	● Educate and sensitize workers and the local community on STI, HIV /AID's and other communicable diseases; ● Create awareness on project grievance redress mechanism.
Traffic related accidents and associated emissions as a result of implementing during civil works under the EA-RDIP	**As provided by ESS4** ● The contractor and the school administration shall prepare a traffic safety plan through segregating traffic safety, equipment operation and walking areas to reduce on conflicts and possible injuries; ● Contractor shall avoid school learning peak hours for transport of construction materials and equipment; ● Warning signs shall be provided to the access roads to warn school community during transportation of construction materials; ● Contractor shall emphasize safety aspects among project drivers, especially speed limits to the school; ● Whenever dust suppression along access roads will be necessary, water will be sprayed; ● Contractors should regularly inspect vehicles safety and employed trained drivers to minimize potential traffic related accidents.
Solid Waste Generation	● As provided by ESS 3 and 4 ● Contractor should prepare construction waste management plan that they should follow as they undertake the works; ● Encourage the use of integrated solid waste management system through hierarchy of options that is source reduction, re-use, recycling and composting; ● Sensitize construction workers on appropriate waste handling and disposal of all construction related waste in designated areas; ● Provide appropriate waste receptacles on site; ● Restrict open burning of solid waste generated at sites; ● Contractor will keep records of waste disposal as proof for proper management of waste as designed;
E-wastes Management from constructions site	● Implementation of standalone E- Waste Management Plan prepared separately for EA-RDIP ● Segregation of Waste at source and avoid mixing with other wastes ● Collection: Establish collection centers who can be individually or jointly or as registered society. They could also be owned by a designated agency, a company or an association to undertake collection operations of E-waste; ● Transportation: Once general waste is collected at designated places, the contracted service providers collect and take it to dumping sites and recycling facilities for processing ● Recycling: identify both formal and informal recycling activities in the Somaliland market where the wastes can be recycled ● Refurbishment: identify licensed entrepreneurs and organized groups which are refurbishing E-waste in the country with the intent of increasing product lifespan ● Take back: identify manufactures who have introduced take-back programmes in the Somaliland and collaborate with them for uptake of the wastes.

Table 4-8: Construction Phase Social Risks

Social Impact / Health and Safety Impacts	Proposed Mitigation Measures
Arrangement for Security at Work Sites	● The Somaliland government, and in consultation with design risk engineers, will determine balancing of the security risks with the potential development benefits in high risk areas. ● Project activities will initially focus on deploying links in sub-regions with a moderate security threat profile, and gradually deploy additional links in more insecure areas, as and when the security context evolves positively and provides a more permissible operating environment. ● Site-specific assessments in the sub-regions will be required prior to the commencement of the infrastructure works through support from security risk management firms; ● Only for acceptable risk levels, a no objection to commence works for specific sites will be provided by the Bank. ● Further protocol details and holding point structures will be included in the Project Operation Manual. This will include a procedure to include management views on World Bank no objection to launch new phases of network deployment or initiating contracts in previously higher risk areas. ● For areas where works are at acceptable risk level, basic risk management approaches will be outlined in the site-specific Security Management Plans (SMP). Training workers on-site on basic security elements, response to and reporting incidents among other will also be undertaken. ● In addition, capacity strengthening measures including security advisors in the PIUs are required from the client in this case MICT ● The task team will work with procurement to ensure flexibility in contracting and budgeting in need for a 'security premium' for contractors needing to hire additional security; while a militarized approach to security will be avoided. ● Specialized security risk management firms may be hired to support assessments as needed.
Labor Influx Impacts triggered during implementation of civil works under the EA-RDIP	**As provided by ESS 2** ● Reduce labor influx by tapping into the local workforce. Depending on the size and the skill level of the local workforce, a share of the workers required for the project may be recruited locally. This may be easier for unskilled workmen. Specialized workmen may be hired from elsewhere. Local workers may also be trained especially if they are required for the operation of the project. ● C-ESMP that contractor to prepare a Labor Management Plan (LMP) that included mandatory requirement to procure all unskilled (and as much as possible, semi-skilled) labor as well as locally available materials from the local community while ensuring equal pay for equal work for men, women and people with disability ● The contractor will ensure effective community engagement and strong grievance mechanisms on matters related to labor with a discrete mechanism for safely and confidentially reporting issues of SEA and GBV at the community level triggered by the Project

Social Impact / Health and Safety Impacts	Proposed Mitigation Measures
	● Effective contractual obligations for the contractor to adhere to the mitigation of risks against labor influx, the contractor should engage a local community liaison person ● The contractor will ensure proper records of labor force on site while avoiding child and forced labor ● The works contractor should be required, under its contract, to prepare and enforce a No Sexual Harassment and Non-Discrimination Policy, in accordance with national law as well as to the World Bank Code of Conduct guidelines where applicable. ● The contractor will develop and implement a children Protection Strategy, this strategy will ensure that no child under the legal age of 18years in employed to the Project.
Gender Based violence and Sexual Harassment during implementation of civil works under the EA-RDIP	**As provided by ESS 2** ● The existing community structures headed by location chiefs should be involved in local labor hire, emphasize the requirement of hiring women, youth and people with disability and VMGs ● Protecting Human Risk Areas Associated with, Disadvantaged Groups, Interfering with Participation Rights and interfering with Labor Rights: ● Treat women and children (persons under the age of 18) with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. ● Do not use language or behavior towards women or children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate. ● Sexual activity with children under 18—including through digital media is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense. ● Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. ● Sexual interactions between contractor's and consultant's employees at any level and member of the communities surrounding the workplace that are not agreed to with full consent by all parties involved in the sexual act are prohibited. This includes relationships involving the withholding, promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex – such sexual activity is considered "non-consensual" within the scope of this Code. ● Where an employee develops concerns or suspicions regarding acts of GBV by a fellow worker, whether in the same contracting firm or not, he or she must report such concerns in accordance with Standard Reporting Procedures. ● All employees are required to attend an induction-training course prior to commencing work on site to ensure they are familiar with the GBV Code of Conduct. ● All employees must attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the institutional GBV Code of Conduct.

Social Impact / Health and Safety Impacts	Proposed Mitigation Measures
Children Protection from engaging in labor and protection from Violence under the EA-RDIP	**As provided by ESS 2** ● The contractor will develop and implement a Children Protection Strategy that will ensures minors are protected against negative impacts associated by the Project including SEA. ● All staff of the contractor must sign, committing themselves towards protecting children, which clearly defines what is and is not acceptable behaviors ● Wherever possible, ensure that another adult is present when working in the proximity of children. ● Not invite unaccompanied children to workers home, unless they are at immediate risk of injury or in physical danger. ● Refrain from physical punishment or discipline of children ● Refrain from hiring children for domestic or other labor, which is inappropriate given their age, or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
Sexual Exploitation and Abuse (SEA) triggered by workers on community members and fellow workers at project implementation stage	**As provided by ESS 2** ● Develop and implement a SEA action plan with an Accountability and Response Framework as part of the C-ESMP. The SEA action plan will follow guidance on the World Bank's Good Practice Note for Addressing Gender-based Violence in Investment Project Financing involving Major Civil Works (Sept 2018). ● Prevention of SEA: including CoCs and ongoing sensitization of staff on responsibilities related to the CoC and consequences of non-compliance; project-level IEC materials; ● Engagement with the community: including development of confidential community-based complaints mechanisms discrete from the standard GRM; main-streaming of Sexual Exploitation and Abuse (SEA) awareness-raising in all community engagement activities; community-level IEC materials; regular community outreach to women and girls about social risks and their SEA-related rights; ● Management and Coordination: including integration of SEA in job descriptions, employments contracts, performance appraisal systems, etc.; development of contract policies related to SEA, including whistle-blower protection and investigation and disciplinary procedures; training for all project management; management of coordination mechanism for case oversight, investigations and disciplinary procedures; supervision of dedicated PSEA focal points in the project and trained community liaison officers.
Spread HIV/AIDs due to large numbers of workers both local and international working on sub projects	**As provided by ESS 2 and ESS4** ● Education and sensitization of workers and the local communities on STIs including provision of condoms to the project team and the public; ● Institute HIV/AIDS awareness and prevention campaign amongst workers for the duration of the contract e.g. erect and maintain HIV/AIDS information posters at prominent locations as specified by the Resident Engineer; ● Procure and distribute Condoms among staff and community members

Social Impact / Health and Safety Impacts	Proposed Mitigation Measures
	● Sensitize workers and the surrounding communities on awareness, prevention and management of HIV/AIDS and sexual health and rights through staff training, awareness campaigns, multimedia and workshops or during community Barazas. ● Use existing clinics to provide VCT services to construction crew and provision of ARVs for vulnerable community members
Spread of COVID-19 among Community Members	**As provided by ESS 2 and ESS4** ● Avoid concentrating of more than 15 community members at one location. Where two or more persons are gathered, maintain social distancing of at least 2 meters; ● The team carrying out engagements within the communities on one-on-one basis will be provided with appropriate PPE for the number of people they intend to meet; ● Use traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently. Ensure to provide and allow participants to provide feedback and suggestions. ● Hold meetings in small groups, mainly in form of FGDs if permitted depending on restrictions in place and subject to strict observance of physical distancing and limited duration. ● In situations where on-line interaction is challenging, disseminate information through digital platform (where available) like Facebook and WhatsApp & Chart groups. ● Ensure on-line registration of participants, distribution of consultation materials and share feedback electronically with participants.
Conflicts associated with the Project during construction phase	**As provided by ESS 10** ● The community will be constantly sensitized on available Grievance Redress Mechanism established by PIU Teams. The mechanisms emphasize resolution of disputes at Common Interest Group (CIG) level, which is the lowest community structure. ● In consultation with the benefiting communities and develop means to ensure equitable sharing of resources

<u>Operation Phase:</u>

The infrastructure installed under the EA-RDIP for Somaliland will be operated and marinated by MICT. Apart from regular operation and maintenance, a number of issues would require special attention for reducing/avoiding possible adverse environmental impacts. The main component of adverse risks will be from IT apparatus which generate **e-wastes upon malfunctioning, e- wastes have been known to affect people's health due to lead and mercury poisoning**. The nature of e- wastes generated will be from below listed apparatus

List of E- Wastes
E- wastes will be from malfunctioned gadgets including once listed below ● Centralized data processing: ✔ Mainframes ✔ Minicomputers c. Servers

✔ Printer units ● Personal computing: ● Personal computers (CPU, mouse, screen and keyboard included) Laptop computers (CPU, mouse, screen and keyboard included) Notebook computers ● Notepad computers ● Copying equipment ● Electrical and electronic typewriters ● Pocket and desk calculators and other products and equipment for the collection, storage, processing, presentation or communication of information by electronic means ● User terminals and systems ● Facsimile Telex Telephones ● Pay telephones Cordless telephones Cellular telephones ● Answering systems and other products Broadcasting equipment for transmitting sound, images or other information by telecommunications

The ecological, economic and social consequences resulting from poor handling and management of E-waste include:

Consequences of E-wastes	Risks associated with e-wastes
Environmental consequences	● Air pollution, especially when E-waste is burnt ● Waste management problem of non-biodegradable equipment ● Toxicity and radioactive nature of E-waste degrades the environment ● Blockage of water runoff channels
Economic consequences	● Substantial public spending on health care ● Investments in complex and expensive environment remediation technologies ● Loss / waste of resources that can be recycled for re-use ● Opportunities for recycling industries and employment lost ● Ozone depletion has led to unpredictable weather conditions.
Social consequences	● E-waste affects people's health (e.g. lead and mercury poisoning). ● Growth of informal waste disposal centers in the neighborhood ● Informal trade and management of E-waste ● Loss of appreciation for ICT

Table 4-9 below provide a snapshot of mitigation measures during operation phase of the projects

Table 4-9: **Operational Phase Environment and Social Risks**

Environment and Social Risks	Mitigation
e- wastes management	**Applicable to ESS 3** ● Implementation of standalone E- Waste Management Plan prepared separately for EA-RDIP ● Segregation of Waste at source and avoid mixing with other wastes ● Collection: Establish collection centers who can be individually or jointly or as registered society. They could also be owned by a designated agency, a company or an association to undertake collection operations of E-waste; ● Transportation: Once general waste is collected at designated places; the contracted service providers collect and take it to dumping sites and recycling facilities for processing

	● Recycling: identify both formal and informal recycling activities in the Somaliland market where the wastes can be recycled ● Refurbishment: identify licensed entrepreneurs and organized groups which are refurbishing E-waste in the country with the intent of increasing product lifespan ● Take back: identify manufactures who have introduced take-back programs in the Somaliland and collaborate with them for uptake of the wastes. ● Raise public awareness about E-waste and its management. ● Develop and disseminate simplified version of strategy, guidelines, regulations and standards ● Disseminate the simplified version national E-waste management strategy, guidelines, regulations and standards ● Participate in regional and international fora on best practices in E-waste management. ● Develop and disseminate brochures, fliers, pamphlets, advertisements etc. on E- waste management. ● Develop education curriculum at all levels of education and encourage research and development on E-waste. ● Develop a system of collection of reliable, accurate and up to date data on Electrical and Electronic Equipment (EEE) and generated Waste Electrical and Electronic Equipment (WEEE) in the country.
Security risks, attack by militia groups.	**Applicable to ESS2 and ESS4** ● Ensuring security of installation in collaboration with law enforcing agencies, ● Keeping complain book at installations for recording of people's complaints, and ● Comply with the Security Management Plan for the project, ● PIU shall work closely with the Ministry of Interior to ensure the security of the workers, Project teams shall seek security approval and clearances form the project coordinator. ● Project teams shall be periodically subjected to security awareness campaigns. ● Project teams should have alternative communication devices, such as two-way radios or satellite phones in areas with limited or no cellular network coverage. ● Use local leaders as part of the project implementation committee members,
Occupational Health & Safety	**Applicable to ESS2 and ESS4** ● The 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).

Forced Labour	**Applicable to ESS2** ● The employment of project workers will be based on the principle of fair treatment; ● The project management will hold sensitization meetings on forced labour and conflict resolution mechanism ● The contracts with third parties will include prohibition of forced labour requirements as part of the monitoring system ● All contracts will have contractual provisions to comply with the non-use of forced labour requirements including penalties for non-compliance in-line with the relevant national laws. ● Subproject Environmental and Social Management Plans (ESMPs) will clearly forbid the use of forced labor.
SEAH/GBV Incidences	**Applicable to ESS2 and ESS4** ● The project will undertake GBV risk assessment and mapping of GBV services. ● Sensitization campaigns and awareness creation on GBV services. ● All direct and contracted workers will sign a CoC, ● Periodically update GBV assessment of potential risks that may arise in relation to primary suppliers. ● Application of WB GBV Guidance Notes in work procedures and interactions, especially those addressing social aspects. ● Special GRM for GBV/SEA/SH cases will be set up, and ● GBV Risk Assessment and Action Plan has been prepared and that the project will comply with the measures outlined in the GBV-Action Plan.

5 PROCEDURES FOR PREPARATION, REVIEW, CLEARANCE, AND IMPLEMENTATION OF ENVIRONMENT AND SOCIAL SAFEGUARDS INSTRUMENTS

5.1 Environment and Social Assessment Overview

In consistence with the requirements of ESS 1, The PIUs at MICT will carry out environmental and social assessments of the program/activities to assess the environmental and social risks and impacts. The assessment to be carried should be proportionate to the potential risks and impacts of the sub project, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts throughout the project life cycle, including those specifically identified in ESSs 2–10.

5.2 Environment and Social Assessment Screening

Environmental and Social pre-screening is designed to identify and appraise the type and scale of any adverse environmental and social impacts or risks that may arise from a planned sub-project or site-specific activity. These measures aim to achieve the avoidance, minimization or mitigation, including offset or compensation, of adverse environmental and social impacts of the Project and to ensure compliance with the national laws and regulations. The first step in the screening process is the determination of the' environmental and social aspects of activities as detailed under the project components, this is done so as to ascertain the type of environmental and social assessment required (if any) in accordance with ESS 1 and consistent with the ESSs.

The objectives of screening are to:

- Screen the environmental and social risks and impacts of a subproject
- Determine the type/s of mitigation measures, assessment, specific plan(s) or safeguard instrument(s) to be prepared based on the outcomes of the screening.
- The screening process could also be used to identify ineligible project activities that will not be supported by the project as listed in the exclusion list provided under appendix 1. This is done by analyzing the proposed activities in relation to their environmental & social context (area of influence) using a checklist approach.

An Environmental and Social Screening Checklist is provided in **Annex I**. The EA-RDIP has been classified overall as High Risk. Nonetheless, the screening process of the project components activities will inform decision makers and the project management of the nature and extent of potential environmental and social risks and impacts of each sub-project which may have a different and lower risk rating. Based upon the screening result the appropriate E&S instruments will be prepared.

The environmental and social safeguard screening will occur during the sub project preparation stage as a soon as the fairly accurate site location(s) is (are) known for the sub-project(s). This sub-section sets out the procedures for identifying, preparing and implementing the sub project environmental and social screening; preparation of required E&S plans; consultation on such plans; review and approval; and implementation.

5.3 Environment and Social Assessment Scoping

5.3.1 Scoping Process

The process of Environment and Social Impacts (ESIA) preparation starts with a scoping assessment. The assessment informs the level of Environment and Social Impact Assessment (ESIA) required for the proposed project components as indicated below:

- Determination of applicable national and international policy provisions and legal statute relevant to the project
- Relevant stakeholders to be meaningfully consulted and engaged during the ESIA stage
- Determination of the scope and geographical extend of Environment and Social Impacts to be analyzed further at ESIA stage.

The scoping procedure will be undertaken through; Literature Review, Field Assessment, Data collection, Site Surveys, Secondary and Primary Data. The Scoping assessment presents aspects as summarized below:

- Description of project background
- Determination of project area of influence (Geographical, Social and Stakeholders)
- Consideration of all project-relevant physical, biological, socio-economic, cultural aspects & risks
- Analysis of alternatives
- Impact identification (Direct, Indirect, Induced, & Cumulative)
- Preliminary mitigation measures
- Definition of assessment methods for ESIA & personnel required.

Key Considerations for Proposed Environmental and Social Assessments is summarized in the box below.

- The environmental and social assessment should be based on current information (which can be obtained through literature reviews, field studies, stakeholder engagement, etc.), including an accurate description and delineation of sub-projects and any associated aspects.
- It should include collection, collation, analysis and interpretation of environmental and social baseline data at an appropriate level of detail sufficient to inform characterization and identification of risks and impacts and mitigation measures.
- The assessment should evaluate the project component activities' i) Potential environmental and social risks and impacts; ii) Examine project alternatives; iii) Identify ways of improving project selection, siting, planning, design and implementation in order to apply the mitigation hierarchy for adverse environmental and social impacts and seek opportunities to enhance the positive impacts of the project.
- The environmental and social assessment will include stakeholder engagement as an integral part of the assessment, in accordance with ESS 10.
- The environmental and social assessment should be an adequate, accurate, and objective evaluation and presentation of the risks and impacts, prepared by qualified and experienced persons.
- Project Implementation Units responsible for will procure qualified and experienced professionals and also retain independent specialists to carry out the environmental and social assessment.

5.3.2 Assigning of Environmental Risk Classification

Impact identification and assessment starts with scoping and continues through a structured impact assessment process. The principal steps comprise the following steps.

- **Impact prediction -** to determine what could potentially happen to resources and receptors as a consequence of the Project and its associated activities;
- **Impact evaluation -** to evaluate the significance of the predicted impacts by considering the magnitude of the effect and the sensitivity, value, and importance of the affected resource or receptor;
- **Mitigation and enhancement -** to identify appropriate and justified measures to mitigate negative impacts and enhance positive impacts; and
- **Residual impact evaluation -** to evaluate the significance of impacts assuming effective implementation of mitigation and enhancement measures.

The terminologies used to describe impact characteristics is shown in **Table 5.1**

Table 5-1: Impact characteristics

CHARACTERISTIC	DEFINITION	DESIGNATION
Type	A descriptor indicating the relationship of the impact to the Project (in terms of cause and effect)	Direct, Indirect, Induced
Extent	The 'reach' of the impact (e.g., confined to a small area around the Project Footprint, Projected for several km etc.)	Local, Regional, International
Duration	The time period over which a resource/ receptor is affected	Temporary, Short term, long term Permanent
Scale	The size of the impact (e.g., the size of the area damaged or impacted, the fraction of a resource that is lost or affected, etc.)	No fixed designation, intended to be a numerical value or a qualitative description of intensity
Frequency	A measure of the constancy or periodicity of the impact	No fixed designation, intended to be a numerical value or a qualitative description

The definitions for the type designations are shown in **Table 5.2**.

Table 5-2: Impact characteristics

DEFINITION	DESIGNATION
Direct	Impacts that result from a direct interaction between the Project and a resource/receptor (e.g., between occupation of a plot of land and the habitats which are affected
Indirect	Impacts that follow on from the direct interactions between the Project and its environment as a result of subsequent interactions within the environment (e.g., viability of a species population resulting from loss of part of a habitat as a result of the Project occupying a plot of land).
Induced	Impacts that result from other activities (which are not part of the Project) that happen as a consequence of the Project (e.g., influx of camp followers resulting from the importation of a large Project workforce).

The above characteristics and definitions apply to planned and unplanned events. An additional characteristic that pertains unplanned events is likelihood. The likelihood of an unplanned event occurring is designated using a qualitative scale, as described in **Table 5.3.**

Table 5-3: Definition of Likelihood

LIKELIHOOD	DEFINITION
Unlikely	The event is unlikely but may occur at some time during normal operating conditions
Possible	The event is likely to occur at some time during normal operating conditions.
Induced	Impacts that result from other activities (which are not part of the Project) that happen as a consequence of the Project
Likely	The event will occur at normal operating conditions (i.e., it is essentially inevitable).

Once an impact's characteristics are defined, the next step in the impact assessment phase was to assign each impact a 'magnitude'. Magnitude is a function of some combination of the following impact characteristics:

- Extent
- Duration
- Scale
- Frequency

Magnitude essentially describes the intensity of the change that is predicted to occur in the resource/receptor as a result of the impact. As discussed above, the magnitude designations themselves are universally consistent, but the descriptions for these designations vary on a resource/receptor-by resource/receptor basis. The universal magnitude designations are:

- Positive
- Negligible
- Small
- Medium
- Large

In the case of a positive impact, no magnitude designation (aside from 'positive') is assigned. It is considered sufficient for the purpose of the area of influence to indicate that the Project is expected to result in a positive impact, without characterizing the exact degree of positive change likely to occur. In the case of impacts resulting from unplanned events, the same resource/receptor-specific approach to concluding a magnitude designation is utilized, but the 'likelihood' factor is considered, together with the other impact characteristics, when assigning a magnitude designation.

In addition to characterizing the magnitude of impact, the other principal impact evaluation step is definition of the sensitivity, vulnerability and importance of the impacted resource/receptor. There are a range of factors to be considered when defining the sensitivity/vulnerability/importance of the resource/receptor, which may be physical, biological, cultural or human. Other factors may also be considered when characterizing sensitivity/vulnerability/importance, such as legal protection, government policy, stakeholder views and economic value.

As in the case of magnitude, the sensitivity/vulnerability/importance designations themselves are universally consistent, but the definitions for these designations vary on a resource/receptor basis. The sensitivity/vulnerability/importance designations used herein for all resources/receptors are:

- Low
- Medium
- High

Significance

Once magnitude of impact and sensitivity/vulnerability/importance of resource/receptor were characterized, the significance was assigned for each impact. Impact significance was designated using the matrix shown in **Table 5.4**.

Table 5-4: Impact Significance

Risk / Impact	**SENSITIVITY / VULNERABILITY / IMPORTANCE OF RESOURCE / RECEPTOR**			
Magnitude of Impact		Low	Medium	High
	Negligible	Negligible	Negligible	Negligible
	Small	Negligible	Minor	Moderate
	Medium	Minor	Moderate	Major
	Large	Moderate	Major	Major

The matrix applies universally to all resources/receptors, and all impacts to these resources/receptors, as the resource/receptor-specific considerations were factored into the assignment of magnitude and sensitivity, vulnerability and importance designations that enter into the matrix.

5.3.3 Mitigation and Enhancement Measures

Further, once the significance of an impact was characterized, the next step was to evaluate what mitigation and enhancement measures are warranted. For the purposes of this assessment, the following order or hierarchy was applied for development of mitigation:

- Avoid at Source, Reduce at Source: avoiding or reducing at source through the design of the Project (e.g., avoiding by siting or re-routing activity away from sensitive areas or reducing by restricting the working area or changing the time of the activity).
- Abate on Site: add something to the design to abate the impact (e.g., pollution control equipment, traffic controls, perimeter screening and landscaping).
- Abate at Receptor: if an impact cannot be abated on-site then control measures can be implemented off-site (e.g., noise barriers to reduce noise impact at a nearby residence or fencing to prevent animals straying onto the site).
- Repair or Remedy: some impacts involve unavoidable damage to a resource (e.g., agricultural land and forestry due to creating access, work camps or materials storage areas) and these impacts can be addressed through repair, restoration or reinstatement measures.
- Compensate in Kind including offset, Compensate Through Other Means: where other mitigation approaches are not possible or fully effective, then compensation for loss, damage and disturbance might be appropriate (e.g., planting to replace damaged vegetation, financial compensation for damaged crops or providing community facilities for loss of fisheries access, recreation and amenity space).

The priority in mitigation for the Project was to first apply mitigation measures to the source of the impact (i.e., to avoid or reduce the magnitude of the impact from the associated Project activity), and then to address the resultant effect to the resource/receptor via abatement or compensatory measures or offsets (i.e., to reduce the significance of the effect once all reasonably practicable mitigations have been applied to reduce the impact magnitude

5.3.4 Residual Impact

In addition, once mitigation and enhancement measures were specified the next step in the Impact Assessment Process was to assign residual impact significance. This is essentially a repeat of the impact assessment steps discussed above, considering the implementation of the proposed mitigation and enhancement measures.

5.3.5 Management and Monitoring and Audit

The final stage in the impact assessment process was the development of a management plan for implementing controls and mitigation and also monitoring the effectiveness. Monitoring is done to verify that: a) impacts or their associated project components remain in conformance with applicable standards; and b) mitigation measures are effectively addressing impacts and compensatory measures and offsets are reducing effects to the extent predicted.

5.4 Preparation of Environment and Social Instruments

E&S Specialist would recommend the type of assessment after reviewing the screening and Scoping reports. The PIU would review and approve the recommendation of the E&S Specialist and submit the screening and scoping report to the Bank for Bank review and clearance to undertake Environment and Social Assessment commensurate to the potential risks and impacts of the project. The PIU shall there after engage the services of ESIA consultants to prepare the detailed assessment.

The PIUs Safeguards Specialist's duties include backstopping the sub-projects implementing teams to comply with the relevant National Environmental and Social requirements and the World Bank's ESF requirements. This includes reviewing, screening, approving, monitoring and reporting on the progress of the sub-projects. The Technical persons hired by the ministries (Environment and Social Consultancy Firm) should guide the formulation and development of the sub project specific ESMPs for the project, and periodically (quarterly) review and improve capacity to manage safeguards compliance amongst local stakeholders

5.5 Review and Approval

The Environment and Social Instruments prepared for civil works shall be reviewed by Environmental and Social Specialists at PIU within MICT and cleared by World Bank. Thereafter the reports (safeguard instruments) will be submitted to the relevant authorities Somaliland
Ministry of Environment and Climate Change

5.6 Public Consultations and Disclosure

In carrying out the ESIA or ESMP and RAPs, supporting evidence of comprehensive public consultation shall be required, such as signed minutes of consultation meetings, attendance lists and filled questionnaires. Public consultations shall take place during the environmental and social screening process and during the validation of the ESIA and RAP report. The results of public consultation shall be incorporated and or influence the design of mitigation and monitoring measures. ESIA study reports for the subproject shall be disclosed in-country by the client (MICT) in formats that are accessible to all project stakeholders and on the World Bank external website. Public consultations should be conducted in a manner accessible to all project stakeholders, and taking into account the guidance set out in the project Stakeholder Engagement Plan and any other relevant guidance, such as the Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings due to COVID19. A notice of the meeting shall be communicated at least seven (7) days before the actual meeting date.

5.7 Environmental and Social Provisions in the Tender Documents

The tender documents on construction of infrastructure under General and Specification Section will provide a clause for the bidder that within 42 days of commencement of works that they should submit a Project Specific Construction Environmental and Social Management Plan (C-ESMP) and Health and Safety Plan for review and approval by the PIU at the MICT. Additional environmental, social, gender, health and safety clauses and Environment Health and Safety Guidelines (EHSG) General Guidelines and Telecommunication Guidelines will be provided to help bidders understand what will be required to implement the environmental and social measures associated with the sub-project. The Compliance of this Clause by the Contractor is deemed to be covered in his rates quoted in the Bid.

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. The ESHS topics identified during the Environmental and Social Impact Assessment of the project will be included in specifications of tenders for construction of infrastructure as presented in **Table 5-5** below,

Table 5-5: Inclusion of Environment and Social Provisions in Tender Documents

Environment and Social Provisions in Tender Documents	***Yes/no***
ESHS resources and facilities and ESHS monitoring organization	*[select:]* YES / NO
Project Areas management (base camps and borrow pits, water sources, storage areas)	*[select:]* YES / NO
Health & Safety on work-sites	*[select:]* YES / NO
Management of SEA-SH, GBV, VAC and Child Labor, safeguarding VMG& IP and PLWD	*[select:]* YES / NO
Local recruitment and ESHS trainings of local staff (capacity building), ESHS trainings of sub-contractors and local partners (transfer of knowledge)	*[select:]* YES / NO
Relations with stakeholders, information and consultation of local communities and authorities	*[select:]* YES / NO
Traffic management	*[select:]* YES / NO
Hazardous materials and oil products management	*[select:]* YES / NO
Waste-water (effluents) Management	*[select:]* YES / NO
Protection of water resources	*[select:]* YES / NO
Atmospheric emissions, noise and vibrations	*[select:]* YES / NO
Solid Waste management including e-wastes	*[select:]* YES / NO

Biodiversity: protection of fauna and flora	*[select:]* YES / NO
Site rehabilitation and re-vegetation	*[select:]* YES / NO
Erosion and sedimentation	*[select:]* YES / NO
Control of infectious and communicable diseases (COVID 19, HIV/AIDS, malaria, etc.)	*[select:]* YES / NO
Grievance Management	*[select:]* YES / NO

5.8 Licensing and Permits

PIU would require to ensure that all permits, consents and authorizations are obtained that are activity specific before commencement of the respective Sub-project activity. Thereafter, comply with terms of permits, consents, and authorizations throughout Project implementation.

MICT shall require each private sector entities involved in the Project for purposes of Project operation and maintenance phase to adopt and implement Environmental and Social mitigation actions as well as enhance its capacity in accordance with the requirements set out in the respective Service Level Agreements/Concession Agreements which shall be prepared by MICT, according to the requirements of applicable ESSs. Key safeguards instruments including the Sub project Environment and Social Assessment, ESMP, resettlement action plan, Security Management plans shall be prepared or updated as necessary before commencement of the project/subproject activities.

5.9 Construction Stage

The PIU will recruit qualified consultant firm/Owner's Engineer will support in supervisory work. The PIU will also have a dedicated Environment, Social, Health, and Safety officer to monitor C-ESMP implementation, labour management and occupational health and safety risks. The PIU will ensure the C-ESMP are prepared with minimum provisions listed below.

C-ESMP

a) Project Background Information *b) General Information* *c) Contractors Environment, Social, Health and safety Policies* *d) Licenses and Permits to be acquired* *e) Personal Protective Equipment/welfare requirements* *f) Scope of ESMP and HSMP* *g) Objectives of the ESMP and HSMP* *h) Project Description and Baseline Information* *i) Site and Work Activities* *j) Analysis of Legal Provisions* *k) Resource Roles and Responsibilities of Workforce on site* *l) Competence and awareness training* *m) Standard Operating Procedures* *n) Stakeholder engagement and Grievance Management* *o) Environment, Social Health and Safety Management Plan for Specific site activities* p) *Environment Social Health and Safety Monitoring Plan*	*q) Noise and Vibration Management Plan* *r) Hazardous Prevention and Control Plan* *s) Solid and liquid Waste Management Plan* *t) Health and Safety Management Plan* *u) Gender Based Violence, Sexual Exploitation Prevention and Response Plan* *v) Program Induced Labor Influx* *w) Workers Accommodation Plan* *x) COVID-19, HIV/AIDS and Drug Abuse Prevention* *y) Security Plans* *z) Employees and Employers Code of Conduct* *aa) Logistic Risks Management Plan* *bb) Grievance Redress Mechanism* *cc) Traffic Management Plan* *dd) Emergency Preparedness and Response Plan* *ee) Material Borrow pits/Quarry Management Plan* *ff) Biodiversity Management Plan* *Erosion and Sediment Control Plan*

Labour Management

The ESIA prepared for the sub projects will provide that at project implementation stage the contractor will prepare a Labor Management Plan (LMP) that includes mandatory requirement to procure all unskilled (and as much as possible, semi-skilled) labor as well as locally available materials from the local community while ensuring equal pay for equal work for men, women and people with disability. Measures listed below will be implemented:

- The contractors will reduce labor influx by tapping into the local workforce. Depending on the size and the skill level of the local workforce, a share of the workers required for the project may be recruited locally. This may be easier for unskilled workmen. Specialized workmen may be hired from elsewhere. Local workers may also be trained especially if they are required for the operation of the project.
- The contractor will ensure effective community engagement and strong grievance mechanisms on matters related to labor with a discrete mechanism for safely and confidentially reporting issues of SEA and GBV at the community level triggered by the Sub Project
- Effective contractual obligations for the contractor to adhere to the mitigation of risks against labor influx, the contractor should engage a local community liaison person
- The contractor will ensure proper records of labor force on site while avoiding child and forced labor
- The works contractor should be required, under its contract, to prepare and enforce a No Sexual Harassment and Non-Discrimination Policy, in accordance with national law as well as to the World Bank Code of Conduct guidelines where applicable.
- The contractor will develop and implement a children Protection Strategy, this strategy will ensure that no child under the legal age of 18 years is employed to the Project.
- The contractor will ensure SEA is addressed in all employment contracts and a COC is signed by all workers;

- The contractors will develop training and sensitization of workers on SEA and ensure specific signage on SEA zero tolerance in all work sites;

5.10 Implementation Monitoring and Supervision

All the activities to be financed under the project will follow the ESF, environment and social standards and the provisions described and agreed in ESCP prepared to ensure proper management of environment, social, safety and health requirements. PIU will make sure that all bid documents and contracts include the ESMP and require compliance with it. Environmental and social monitoring seeks to check the effectiveness and relevance of mitigation measures through the implementation/operation phase. The PIUs Environment and Social focal points shall monitor project activities.

6 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN, INCLUDING THE INSTITUTIONAL ARRANGEMENTS FOR THE PROJECT IMPLEMENTATION AND SUPERVISION

6.1 Implementation Arrangements of ESMP

This Chapter describes a generic Environmental and Social Management Plan ESMP for ESMF implementation. The ESMP brings to synergy and alignment the implementation of mitigations measures to address risks and impacts, and the responsibilities for mitigation and monitoring. The costs for mitigation and monitoring cannot be determined at this point as specific details are unknown. Nonetheless, a site-specific ESMP to be prepared for interventions detailed under each sub component under Components 1 to 3. For sub-projects which may require environmental and social assessment, the mitigation measures assigned to contractors and their associated cost estimates should be included in the bidding documents to be prepared by the Procurement Specialist(s) at the PIUs.

Table 6-1: Environment and Social Impacts Mitigation Plan – Pre-Construction

Impact / Risks Social risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
Land Acquisition and resettlement resulting to Loss of accruing benefits of owning land including potential loss of livelihoods	**As provided by ESS5** ● Compensation in cash at full replacement value in line with the RAP developed and livelihood assistance, ● Be provided with similar property that is equal in value and size to the said property, ● Where land use is partially affected or with temporary losses, replacement value will be determined for 'loss of use of land' and for temporary losses in line with the project RAP, ● Stakeholder engagement of the PAPs, and Timely disclosure of project information.	RAP report prepared and Implemented for the project	Monthly	*PIU (Safeguards Specialists); Supervising Consultant*	To be included in specific RAPs
Delay in compensation for land take due to land tenure and clan dynamics	**As provided by ESS5** ● Engagement with the parties involved in the conflict, ● Opening an ESCROW account and depositing the compensation money, as dispute is being solved,				
Forced displacement of IDPs by the government to provide land for the sub projects; many IDPs are temporarily occupying government land within the main cities and towns	**As provided by ESS5** ● Compensation in cash at full replacement value for Assets in line with the RAP, ● Compensation for the replacement value for 'loss of use of land' and for temporary losses in line with the project RAP, and ● Setting additional measures relating to livelihood improvement or restoration.				
Social exclusion of Marginalization	**As provided by ESS10**	Number of Marginalized	Monthly	*PIU*	TBD

Impact / Risks Social risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
of certain groups, access to digital services provided under the EA-RDIP	● Selection of the site in line with the approved design and or target criteria, ● Stakeholder engagement to cater for the needs of the larger stakeholders, ● Timely disclosure of project information	groups consulted		*(Safeguards Specialists); Supervising Consultant*	
Discrimination against vulnerable and disadvantaged groups, including IDPs, unemployed youth, women, minority clans and ethnic minorities, such as SSHUTLCs	**As provided by ESS10** ● The employment of project workers should be based on the principle of equal opportunity and fair treatment; ● Inclusive consultations and focus groups particularly to ensure participation of women and other vulnerable groups; ● No discrimination with respect to any aspects of the employment relationship; ● Hold sensitization meetings on resources planning and conflict resolution mechanisms; and ● The contracts with third parties should include non-exclusion requirements as part of the monitoring system.	Number of VMG engaged under the sub projects Number of consultations with VMGs held	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	TBD
Heightened expectation due to underlying social tensions, due to lack of information as well as negative influence about the project	**As provided by ESS10** ● Stakeholder engagement to cater for the needs of the larger stakeholders especially the ● marginalized / minority clans, ● Timely disclosure of project information.	Number of consultations with VMGs held	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	TBD
Workers Camps	**As required by Workers' accommodation processes and standards GUIDANCE NOTE of IFC and European Bank**	Conditions of Workers Camps as associated	Monthly	*PIUs (Safeguards Specialists*	TBD

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Impact / Risks Social risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
	● Before constructing any workers facilities, other potential impacts will be evaluated by the PIU. These may include the impact of construction, and the effect of a new housed labour force on community services, such as health, and on community cohesion and safety. These assessments will form part of a project's Environmental and Social Impact Assessment. ● The next step is to consider the standards to be applied for the location, arrangement and construction of any workers facilities. Issues here to comply with include consideration of a safe and healthy location, application of appropriate construction standards, provision of adequate and sanitary living conditions and provision of appropriate leisure and health facilities. ● Also, when the accommodation has been completed, there are issues around its operation and management which the PIU will monitor and ensure compliance. These include the type of staff who will manage it, development of appropriate management policies, such as security, waste management and grievance procedures, and ongoing liaison with local communities.	facilities		*); Supervising Consultant*	

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Table 6-2: Environment and Social Impacts Mitigation and Monitoring Plan –Construction Stage

Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
Impacts on Soil Resources within areas near the fiber routes and sites for digital masts Project activities related to laying of deployment of new fiber along prioritized routes, plant and equipment could interfere with soil structure making soil resources susceptible to erosion, further plant and equipment could pollute soil resources	**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 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	● Soil quality and level of contamination ● Availability of soil analysis reports ● State of habitats and other sensitive receptors traversed by the fibre cables	Quarterly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific ESIAs

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Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	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				
Impact on Water Resources in within areas near the fiber routes and sites for digital masts Alteration of terrestrial and aquatic habitats which could have adverse impacts especially if linear digital infrastructure may pass through critical habitats or biodiversity hotspots during construction	**As provided by ESS3** ● Discharge of grey water or uncontrolled discharges from the site/working areas (including wash down areas) to adjacent rivers shall not be permitted; ● Contractor should sensitize workers on water conservation and put strict measures to avoid wastage of water, ● Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from vehicles. Hazardous waste should be contained and properly disposed by licensed hazardous waste handlers. ● Water containing pollutants such as cements, concrete, lime, chemicals and fuels shall be	● State of natural storm water drainage channels ● Quality of water flowing within laggas and other water bodies ● State of habitats and other sensitive receptors	Quarterly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific ESIAs

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Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
periods and possibly during maintenance	discharged into a conservancy tank for planned removal from site ● Works that are likely to generate silt-laden runoff such excavations will be undertaken preferentially during the drier months of the year; December-March ● The drainage system will be developed to prevent silt-laden run-off from entering surface water drains and streams without treatment (e.g. earth bunds, silt fences, straw bales, or proprietary treatment) under any circumstances ● Where possible an 8m buffer strip of existing vegetation will be maintained within the project site. ● Earth stockpiles will be seeded as soon as possible, covered with geotextile mats or surrounded by a bund to minimize the risk of sediment-rich run-off ● Tools and plant will be cleaned in designated areas within the site where run-off can be isolated for treatment before discharge to the river or nearby water resources; ● Debris and other material will be prevented from entering watercourses; Construction sites (such as settlement lagoons or other temporary attenuation) to be used during construction if necessary; Diversion of minor watercourses will be carefully managed to prevent suspension of silt (or contamination by other pollutants) ● Discharge into watercourses and water bodies will only be carried out under consent of the relevant governing bodies such as WRA	traversed by the fibre cables			

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Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	● All domestic wastewater from workers camps which may be contaminated with oily substances must be managed in accordance with an appropriate Waste Management Plan (WMP) ● Hydrocarbon-contaminated water shall not be discharged into the environment; ● At construction stage, the contractor will prepare Specific Construction Environment and Social Management Plan (C-ESMP) which included among others: Spoil Management Control Plan, health and safety management plan and Waste Management Plan.				
Impacts on Air Quality to Communities and workers Impact to health of Communities and Workers working on infrastructure projects **under component 1 and 2**	**As provided by ESS4** ● Develop and implement a Dust Management Plan (DMP) and Undertake 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;	● Level of Compliance level Dust Management Plan ● Services and inspection reports of plant and equipment ● Air quality monitoring report findings ● Number of complaints from community related to dust menace	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific ESIAs

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Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	● 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 minimize dust blow.				
Noise and Vibrations Impacts to Communities and workers	**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	Serviced plant and equipment to manufacturers specification	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific ESIAs

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Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	● 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.				
Impact on Flora and Fauna on critical habitats and sensitive receptors such as the mangrove at the coastline	**As provided by ESS6** ● Ensure proper demarcation and delineation of the 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;	● Number of trees replanted as compensatory trees ● Status of reinstatement of completed sites ● State of	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific ESIAs

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Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	● 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 location in advance of clearing. Also, impact on fauna due to habitat destruction and poaching by workers.	habitats and other sensitive receptors traversed by the fiber cables			
Impacts on Cultural Heritage sites, project interfering	Conform to provisions of finds procedures provided in Appendix 2,	● Number of Cultural Heritage Sites impacted by	Monthly	*PIUs (Safeguards Specialists);*	To be included in specific ESIAs

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Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
with critical cultural heritage sites		the project		*Supervising Consultant*	

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
Arrangement for Security at Work Sites	● The Somaliland government, and in consultation with design risk engineers, will determine balancing of the security risks with the potential development benefits in high risk areas. ● Project activities will initially focus on deploying links in sub-regions with a moderate security threat profile, and gradually deploy additional links in more insecure areas, as and when the security context evolves positively and provides a more permissible operating environment. ● Site-specific assessments in the sub-regions will be required prior to the commencement of the infrastructure works through support from security risk management firms; ● Only for acceptable risk levels, a no objection to commence works for specific sites will be provided by the Bank. ● Further protocol details and holding point structures will be included in the Project Operation Manual. This will include a procedure to include management views on World Bank no objection to launch new phases of network deployment or initiating contracts in previously higher risk areas. ● For areas where works are at acceptable risk level, basic risk management approaches will be outlined in the site-specific Security Management Plans (SMP). Training workers on-site on basic security elements, response to and reporting incidents among other will also be undertaken.	Number of Security incidences reported under the Project	Daily	*PIUs (Safeguards Specialists); Supervising Consultant, Security personnel*	To be included in specific Security Risk Assessment and Management Framework (SRAMF)

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	● In addition, capacity strengthening measures including security advisors in the PIUs are required from the client in this case MICT ● The task team will work with procurement to ensure flexibility in contracting and budgeting in need for a 'security premium' for contractors needing to hire additional security; while a militarized approach to security will be avoided. Specialized security risk management firms may be hired to support assessments as needed.				
Labor Influx Impacts triggered during implementation of civil works under the EA-RDIP	**As provided by ESS 2** ● Reduce labor influx by tapping into the local workforce. Depending on the size and the skill level of the local workforce, a share of the workers required for the project may be recruited locally. This may be easier for unskilled workmen. Specialized workmen may be hired from elsewhere. Local workers may also be trained especially if they are required for the operation of the project. ● C-ESMP that contractor to prepare a Labor Management Plan (LMP) that included mandatory requirement to procure all unskilled (and as much as possible, semi-skilled) labor as well as locally available materials from the local community while ensuring equal pay for equal work for men, women and people with disability ● The contractor will ensure effective community engagement and strong grievance mechanisms on matters related to labor with a	Project Compliance to labor provisions Frequency of Stakeholder Engagements Code of conducts signed	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific LMP

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	discrete mechanism for safely and confidentially reporting issues of SEA and GBV at the community level triggered by the Project ● Effective contractual obligations for the contractor to adhere to the mitigation of risks against labor influx, the contractor should engage a local community liaison person ● The contractor will ensure proper records of labor force on site while avoiding child and forced labor ● The works contractor should be required, under its contract, to prepare and enforce a No Sexual Harassment and Non-Discrimination Policy, in accordance with national law as well as to the World Bank Code of Conduct guidelines where applicable. ● The contractor will ensure comply to provisions of Work Place Injuries and Benefits Act (WIBA) 2007 ● The contractor will develop and implement a children Protection Strategy, this strategy will ensure that no child under the legal age of 18years in employed to the Project.				
Gender Based violence and Sexual Harassment during implementation of civil	**As provided by ESS 2** ● The existing community structures headed by location chiefs should be involved in local labor hire, emphasize the requirement of hiring women, youth and people with disability and VMGs	● Mitigation plan for GBV occurring at the community level as a result of project implementation ● Number of GBV	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific GBV/SEAH Prevention and

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
works under the EA-RDIP	● Protecting Human Risk Areas Associated with, Disadvantaged Groups, Interfering with Participation Rights and interfering with Labor Rights: ● Treat women and children (persons under the age of 18) with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. ● Do not use language or behavior towards women or children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate. ● Sexual activity with children under 18—including through digital media is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense. ● Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. ● Sexual interactions between contractor's and consultant's employees at any level and member of the communities surrounding the workplace that are not agreed to with full consent by all parties involved in the sexual act are prohibited. This includes relationships involving the withholding, promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex – such sexual activity is	cases happening at the community level that receive survivor-centered referral and care			Response Plans

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	considered "non-consensual" within the scope of this Code. ● Where an employee develops concerns or suspicions regarding acts of GBV by a fellow worker, whether in the same contracting firm or not, he or she must report such concerns in accordance with Standard Reporting Procedures. ● All employees are required to attend an induction-training course prior to commencing work on site to ensure they are familiar with the GBV Code of Conduct. ● All employees must attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the institutional GBV Code of Conduct.				
Children Protection from engaging in labor and protection from Violence under the EA-RDIP	**As provided by ESS 2** ● The contractor will develop and implement a Children Protection Strategy that will ensures minors are protected against negative impacts associated by the Project including SEA. ● All staff of the contractor must sign, committing themselves towards protecting children, which clearly defines what is and is not acceptable behaviour ● Wherever possible, ensure that another adult is present when working in the proximity of children.	Number of cases reported involving abuse of children	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific GBV/SEAH Prevention and Response Plans

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	● Not invite unaccompanied children to workers home, unless they are at immediate risk of injury or in physical danger. ● Refrain from physical punishment or discipline of children ● Refrain from hiring children for domestic or other labor, which is inappropriate given their age, or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.				
Sexual Exploitation and Abuse (SEA) triggered by workers on community members and fellow workers at project implementation stage	**As provided by ESS 2** ● Develop and implement a SEA action plan with an Accountability and Response Framework as part of the C-ESMP. The SEA action plan will follow guidance on the World Bank's Good Practice Note for Addressing Gender-based Violence in Investment Project Financing involving Major Civil Works (Sept 2018). ● Prevention of SEA: including COCs and ongoing sensitization of staff on responsibilities related to the COC and consequences of non-compliance; project-level IEC materials; ● Engagement with the community: including development of confidential community-based complaints mechanisms discrete from the standard GRM; main-streaming of Sexual Exploitation and Abuse (SEA) awareness-raising in all community engagement	● SEA Action Plan ● Code of Conduct ● Number of staff trainings ● SEA FP ● Community Liaison trained in PSEA ● IEC materials for workers sites and community ● Discrete SEA reporting pathway ● Relevant policies, e.g., investigations and discipline and whistle blower protection ● Monthly minutes from SEA	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific GBV/SEAH Prevention and Response Plans

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	activities; community-level IEC materials; regular community outreach to women and girls about social risks and their SEA-related rights; ● Management and Coordination: including integration of SEA in job descriptions, employments contracts, performance appraisal systems, etc.; development of contract policies related to SEA, including whistle-blower protection and investigation and disciplinary procedures; training for all project management; management of coordination mechanism for case oversight, investigations and disciplinary procedures; supervision of dedicated PSEA focal points in the project and trained community liaison officers.	coordination meetings			
Spread HIV/AIDs due to large numbers of workers both local and international working on sub projects	**As provided by ESS 2 and ESS4** ● Education and sensitization of workers and the local communities on STIs including provision of condoms to the project team and the public; ● Institute HIV/AIDS awareness and prevention campaign amongst workers for the duration of the contract e.g. erect and maintain HIV/AIDS information posters at prominent locations as specified by the Resident Engineer; ● Procure and distribute Condoms among staff and community members ● Sensitize workers and the surrounding communities on awareness, prevention and	● Number of cases of diseases reported ● Rate of absenteeism due to diseases ● No of workers trained on HIV/ AIDS ● Number of gender-disaggregated toilets constructed	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific ESIAs

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	management of HIV/AIDS and sexual health and rights through staff training, awareness campaigns, multimedia and workshops or during community Barazas. ● Use existing clinics to provide VCT services to construction crew and provision of ARVs for vulnerable community members				
Spread of COVID-19 among Community Members	**As provided by ESS 2 and ESS4** ● Avoid concentrating of more than 15 community members at one location. Where two or more persons are gathered, maintain social distancing of at least 2 meters; ● The team carrying out engagements within the communities on one-on-one basis will be provided with appropriate PPE for the number of people they intend to meet; ● Use traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently. Ensure to provide and allow participants to provide feedback and suggestions. ● Hold meetings in small groups, mainly in form of FGDs if permitted depending on restrictions in place and subject to strict observance of physical distancing and limited duration. ● In situations where on-line interaction is challenging, disseminate information through	● Availability of SOP(s), Training material, PPE, sanitizing facilities ● No of workers sensitized on COVID-19 No of hand-washing facilities installed; facemasks and temperature monitors secured, etc	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific ESIAs

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	digital platform (where available) like Facebook and WhatsApp & Chart groups. ● Ensure on-line registration of participants, distribution of consultation materials and share feedback electronically with participants.				
Conflicts associated with the Project during construction phase	**As provided by ESS 10** ● The community will be constantly sensitized on available Grievance Redress Mechanism established by PIU Teams. The mechanisms emphasize resolution of disputes at Common Interest Group (CIG) level, which is the lowest community structure. ● In consultation with the benefiting communities and develop means to ensure equitable sharing of resources	GRM structures in place	Weekly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific ESIAs

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Table 6-3: Environment and Social Impacts Mitigation and Monitoring Plan – Operation Stage

Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
e- wastes management	**Applicable to ESS 3** ● Implementation of standalone E- Waste Management Plan prepared separately for EA-RDIP ● Segregation of Waste at source and avoid mixing with other wastes ● Collection: Establish collection centers who can be individually or jointly or as registered society. They could also be owned by a designated agency, a company or an association to undertake collection operations of E-waste; ● Transportation: Once general waste is collected at designated places; the contracted service providers collect and take it to dumping sites and recycling facilities for processing ● Recycling: identify both formal and informal recycling activities in the Somaliland market where the wastes can be recycled ● Refurbishment: identify licensed entrepreneurs and organized groups which are refurbishing E-waste in the country with the intent of increasing product lifespan ● Take back: identify manufactures who have introduced take-back programs in the Somaliland and collaborate with them for uptake of the wastes.	Reports on Management of E- Wastes related to EA-RDIP	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific E- Waste Management Plan prepared for the project

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	● Raise public awareness about E-waste and its management. ● Develop and disseminate simplified version of strategy, guidelines, regulations and standards ● Disseminate the simplified version national E-waste management strategy, guidelines, regulations and standards ● Participate in regional and international fora on best practices in E-waste management. ● Develop and disseminate brochures, fliers, pamphlets, advertisements etc. on E- waste management. ● Develop education curriculum at all levels of education and encourage research and development on E-waste. ● Develop a system of collection of reliable, accurate and up to date data on Electrical and Electronic Equipment (EEE) and generated Waste Electrical and Electronic Equipment (WEEE) in the country.				
Risk of Accidents and Occupational Safety and Health Concerns during	**As provided by ESS2** ● The 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.	● Number of incidences recorded on site and within workers ● Workers satisfactory	Weekly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific Health and Safety Management Plans (HSMP)

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
operation phase of the facility	● 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). ●	reports with regards to health and safety ● Reported and addressed grievances on site and from workers Signed code of conduct			
Forced Labour in work stations developed under the project	● The employment of project workers will be based on the principle of fair treatment; ● The project management will hold sensitization meetings on forced labour and conflict resolution mechanism ● The contracts with third parties will include prohibition of forced labour requirements as part of the monitoring system ● All contracts will have contractual provisions to comply with the non-use of forced labour requirements including penalties for non-	Number of labour Related Complaints recorded within existing facilities constructed under the project	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific SEAH Prevention and Response Plan

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Social Impact / Health and Safety Impacts	Proposed Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	compliance in-line with the relevant national laws. ● Subproject Environmental and Social Management Plans (ESMPs) will clearly forbid the use of forced labor.				
SEAH/GBV Incidences	● The project will undertake GBV risk assessment and mapping of GBV services. ● Sensitization campaigns and awareness creation on GBV services. ● All direct and contracted workers will sign a CoC, ● Periodically update GBV assessment of potential risks that may arise in relation to primary suppliers. ● Application of WB GBV Guidance Notes in work procedures and interactions, especially those addressing social aspects. ● Special GRM for GBV/SEA/SH cases will be set up, and ● GBV Risk Assessment and Action Plan has been prepared and that the project will comply with the measures outlined in the GBV-Action Plan.	Number of SEAH /GBV Related Complaints recorded within existing facilities constructed under the project	Monthly	*PIUs (Safeguards Specialists); Supervising Consultant*	To be included in specific SEAH Prevention and Response Plan

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7 INSTITUTIONAL ARRANGEMENTS FOR ESMF IMPLEMENTATION

7.1 Institutional Arrangement

A PIU will be established within the MICT, which has a prior track-record of World Bank project implementation under the two phases of the *ICT Sector Support in Somaliland Project* (P148588, P152358), which were completed with a "*Satisfactory*" rating. The PIU will include a Project Coordinator, one FM Specialist, one Procurement Specialist, one M&E Specialist, one Environment Specialists, one Social Specialist and Technical Specialists with subject matter expertise in areas such as connectivity infrastructure. The role of specific institutions relevant to implementation of ESMF provisions is summarized below in **Table 7-1**

Table 7-1: Institutions and Entities Relevant in ESMF Implementation

Institution / Entity	Role
PIU	The PIUs will comprise Engineers, Project Engineers, Procurement Specialists, Environmental and Social Safeguards Specialists, Monitoring and Evaluation Specialists etc. who will provide expert technical guidance on the matters concerning the sub-projects. Specifically, the Units Safeguards Specialists will provide Technical Assistance on the aspect of implementing the provisions of this ESMF at their respective areas; mainly in the screening and scoping of sub-projects and in the selection of appropriate environmental and social assessment instruments. It will collaborate with other state departments accordingly, and liaise directly with the Bank on issues concerning ESF compliance and ESSs applicability relevance on project activities. PIUs will be directly responsible for disclosure of all environmental and social assessment instruments prepared in fulfilment of Bank requirements.
Ministry of Environment and Rural Development (MERD)	MERD is mandated to undertake below listed ● Determine policies for the management, protection and use of the environment; ● Prepare and publish policies, strategies, objectives and standards for the management and protection of the environment; ● Co-ordinate environmental management at national level; and ● Monitor and ensure compliance with the Act.
Somaliland Environmental Management Authority (SEMA)	SEMA is mandated to undertake below listed functions among others ● To coordinate the implementation of Government policy and the decisions of the Sustainable Development Advisory Committee (SDAC) ● To ensure the integration of environmental concerns in overall national planning through coordination with the relevant Ministries, departments and agencies of the Government. ● To liaise with the private sector, intergovernmental organizations, nongovernmental agencies and governmental agencies of other states of issues relating to the environment;
Supervisory Consultants	Supervisory Consultants will supervise the activities of Contractors engaged to implement the main activities. With regards to environmental and social performance, their responsibilities will include monitoring of the implementation of mitigation measures contained in the Contract Agreement of Contractors and in the implementation of the C-ESMP. Supervise the contractors' obligation with

	regard to the Environmental, Social, Health and Safety (ESHS) clauses included in tender documents and in respective contracts.
The World Bank	The Bank will be responsible for the final review and clearance of environmental and social assessment instruments; as well as reviews and the giving of a "no objection" to the Terms of Reference for instruments (ESIAs, ESMPs, ESAPs, etc.). Conduct regular supervision missions to check on the performance of EA-RDIP and assess its compliance to agreed grant covenants and environmental and social instruments; and Recommend measures for improving the performance.

7.2 Capacity Development for Environmental and Social Management and Monitoring

The ESMF provision on capacity enhancement of the environmental and Social Standards skills and competencies of the projects PIU has been built into the project design under component 4 which targets Project Management and Implementation Support.

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 and social 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; (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.

A project level capacity building support on E&S including setting up an E&S risk & impact management system, enhancing the E&S capacity through staffing and training on the ESF requirements based on a robust capacity building plan to be implemented. This will be complimented by institutional strengthening and capacity assessment in participating MDA's to roll out capacity building Plan accordingly. **Table 7-2** below lists some of the proposed training topic which will help building the capacity for smooth implementation of the Project.

Table 7-2: Capacity Building and Training Plan

Objectives	Issues for engagement	Method of engagement	Stakeholders/Target population and area	Responsible person	Time frame
ESMF	Training of all Technical Leads in the ESMF, World Bank Safeguards Awareness, Training of Environmental and Social Standards, Citizen Engagement (Events and workshops for community awareness in the Project areas).	Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments. Private sector, CBO, and other interested stakeholders	PIU	Prior to commencement of activities
ESIAs, ESMPs, ESAPs	Training of all Technical Leads in the Environment and Social Safeguards Instruments, World Bank Safeguards Awareness and Training of Environmental and Social Standards	Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments. Hired Ministry ESIA Consultants	PIU	Prior to commencement of activities
GBV Action Plan	Training of all Technical Leads in the GBV Action Plan	Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments.	PIU	Prior to commencement of activities
GBV Procedures for Reporting and Prevention	Training and monitoring during project implementation to prevent GBV and support reporting of cases	Training, monitoring,	Community members / vulnerable groups	(Lead of GBV sub cluster)	Prior to commencement of activities
Mitigate impact of workers on local communities (LMP & GBV Action Plan)	Implement training of contracted Project Workers designed to heighten awareness of risks and to mitigate impacts on local communities and on their rights	Training	Contracted workers in Project locations	All Technical leads	Prior to deployment

GBV	Response to domestic issues in a non-gender biased manner.	Training	Local leaders (as detailed in the GBV Action Plan)	PIU and Technical Leads	Prior to commencement of activities
Project GRM	Consultation on different GRMS mechanisms in place, development of overall GRM, and Training with all Technical Leads Set up Grievance Redress Mechanism and functioning in the Energy sector	Consultations and Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments.	PIU	Prior to commencement of activities
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 Project locations	Technical leads	Prior to deployment
Create awareness of LMP and H&S Standards for workers	LMP and H&S Standards	Training	Contracted workers in Project locations	Technical leads	Prior to deployment

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Support Emergency Response Measures	Communication of Emergency Response Measure (ERM) to communities	Information, training	Communities in Project areas	PIU	Prior to commencement of activities
Community Health & Safety	Road Safety Awareness	Training	Communities in Project areas, with particular focus on vulnerable communities	PIU and Technical Leads	Prior to commencement of activities
Community Health & Safety	Communicable diseases	Training	Communities in Project areas	PIU and technical leads	Prior to commencement of activities
Community Health & Safety	GBV, as per Action Plan	Training and awareness raising	All Communities in Project areas	PIU and technical leads	Prior to commencement of activities
GRM	Project GRM as described in the SEP	Information disclosure and training	Communities in Project areas, with particular focus on vulnerable communities	PIU and Technical Leads	Prior to commencement of activities

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7.3 Monitoring and Reporting

The PIUs 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 both the quarterly and annual progress reports. The PIUs shall establish a database for each component of the project to periodically monitor the evolution of implementation, outputs, and results, with systems for regular data gathering and processing of information required to monitor the main performance indicators and intermediary indicators as defined in the results framework. The PIUs shall collect and compile data to provide basis for a compressive mid-term review.

The significance of monitoring stems from the fact that the inputs will go into the project design and planning, including mitigation measures, are based largely on "predictions". It is essential that the basis for the choices, options and decisions made in formulating or designing the project and other environmental and social safeguard measures are verified for adequacy and appropriateness. Monitoring verifies the effectiveness of impact management, including the extent to which mitigation measures are successfully implemented. Monitoring specifically helps to:

- Improve environmental and social management practices.
- Check the efficiency and quality of the EA processes;
- Establish the reliability and credibility of the EA for the project (as well as the quality of experts providing EA consultancy services
- Provide the opportunity to report the results on safeguards and impacts and proposed mitigation measures implementation.

7.3.1 Internal Monitoring and Reporting

Internal Monitoring shall begin once E&S project documents are approved and disclosed and the project implementation has commenced. The PIU (and other implementing agencies, as appropriate) commence monitoring as an important feedback mechanism. This ensures that the environmental and social mitigation measures:

- Identified in the planning phase (contained in the ESIA reports), and incorporated in the project design and cost are being implemented.
- Are maintained throughout the construction phase, and where applicable in the operation phase, and to the decommissioning of sites, facilities and equipment;
- Where inadequate, additional remedial actions are identified (including corrective measures or re-design of mitigation measures).

The monitoring by MICT PIUs shall actively and effectively monitor the contractors engaged in the implementation of subproject and covers other areas such as adherence to the environmental and social clauses and principles. The ESMPs and RAPs that are prepared and/or the other mitigation provisions that are made as components or part of the project ESA will 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 agency's agreed action and timeframes and submitted as the respective implementation agency's MICT, and the Bank.

The project monitoring framework shall develop standard reporting forms which shall provide for quarterly and yearly 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.
- RAP implementation Progress Report
- Construction supervision reports that include assessment of contractor's compliance with safeguards;
- Progress report on technical, Environmental and Social 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

7.3.2 External Monitoring and Reporting

The project shall incorporate external monitors. The PIU shall share project monitoring reports with the Bank and these reports would be assessed to ascertain ESF compliance using site-specific ESMPs/ESIAs if prepared. The ESF compliance assessment will assess whether:

- The ESMF, RPF and other relevant Framework process is being correctly adhered to;
- Relevant mitigation measures have been identified and implemented effectively and whether these need to be adjusted to reflect changing circumstances and;
- The extent to which all stakeholder groups are involved in sub-project implementation.

The PIU Environmental and Social Specialists will assess the compliance of all implementers' activities against the ESMF and their subsequent ESMPs and will report possible non-compliance to the Project Coordinator of the PIU. Indicators are identified in both documents, and used as a baseline for assessing progress on implementation. The PIU will also independently conduct its own monitoring, verification and inspection of the activities of all implementers to ensure they are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts. Performance will be integrated into quarterly reports to the WB.

The World Bank will equally supervise and assess the environmental and social performance through review of the biannual monitoring reports and through regular site visits. The GRM will further help track complaints and effectiveness of interventions, including those with environmental and social impacts. Furthermore, Third Party Monitoring Agents (TPMA) will be deployed to monitor overall project implementation, including the implementation of E&S Risk Mitigation Measures. The TPMA will report non-compliance to the PIU and directly to the World Bank

Upon completion of the Project, the PIU shall undertake an assessment of the success of the ESHS instruments and include relevant information in the Implementation Completion Report (ICR). This ICR will be followed by the Bank's own ICR. If either of these assessments reveals that any key objectives of

the ESHS instruments were not achieved, follow-up measures shall be developed to remedy the situation. This is also applicable for site-specific ESMPs, RAPs and other action plans

7.4 Bank's Supervision

The Bank will provide the second line of monitoring compliance and commitments made in the ESCP through implementation support missions albeit in a less frequent manner and detail as compared to the first line of monitoring that will be undertaken by the PIU. The Bank will further undertake monitoring during its scheduled biannual implementation support missions. Specifically, for each year that the agreement is in effect, sub project contractors will be required to submit to the monthly, quarterly monitoring 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.

7.5 Resource and Budget

This sub-section presents a consolidated budget estimate for the implementation of overall Environmental and Social Management Framework. The budget components include: implementing agency safeguards capacity development activities; a training program for all relevant entities to implement their E&S responsibilities. Resettlement Policy Framework, Security Management Framework (SMF), Updated Stakeholder Engagement Plan, Labor Management Procedures, and GBV Action, subproject ESIAs, ESMPs, RAPs, etc.; and annual reviews, below, presents a provisional estimate of the budget needed to implement the ESMF. Table 7-4 below gives the cost estimate (budget) of implementing this ESMF including the preparation of sub projects, monitoring and supervision and capacity building only:

Table 7-3: Resource and Budget

	Required Resources	Estimated Costs in USD
PIU – Monitoring of ESMF		
	Human Resources: 1 Environmental, 1 Social Specialist (48 months x 5500 USD)	264,000
	1 GBV Specialist (48 months x1x 5500 USD)	264,000
	1 OHS consultant (48 months x1x 5500 USD)	264,000
	1 Security Specialist (48 months x1x 5500 USD)	264,000
	Logistics / Travel (Lump sum)	50,000
Grievance Redress Mechanism hotline		
	Hotline and other mechanisms (Lump sum)	10,000
	GBV/SEAH reporting mechanisms (Lump sum)	50,000
Implementation of Risk Mitigation Measures PI		
	Monitoring and SEP implementation (SEP has a separate budget	Separate budget in SEP
	Security Management (Security Management Company on general budget	Separate budget in SRA&SRAMP
	Implementation of GBV Action Plan / GBV Service Provider	Separate Budget under GBV/SEAH Action Plan
	Capacity Development and Training (except items on IP budgets)	100,000
	Total	**1, 266,000**

8 GRIEVANCE REDRESS MECHANISMS

8.1 Grievances Process Overview

The World Bank ESSs require that Bank-supported projects facilitate mechanisms that address concerns and grievances that arise in connection with a project[35]. One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances. The Project GRM should facilitate the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The EA-RDIP will provide mechanisms to receive and facilitate resolutions to such concerns.

As per World Bank standards, the GRM will be operated in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines (see GBV/SEAH and Child Protection Prevention and Response Plan). It will also operate in addition to specific workers' grievance redress mechanisms, which are laid out in the LMP

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

8.2 GRM Core Principles

The GRM is based on six core principles

- **Fairness**: Grievances are treated confidentially, assessed impartially, and handled transparently.
- **Objectiveness and independence**: The GRM operate independently of all interested parties in order to guarantee fair, objective, and impartial treatment in each case. GRM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
- **Simplicity and accessibility**: Procedures to file grievances and seek action are simple enough that stakeholders can easily understand them. Project stakeholders have a range of contact options including, at a minimum, a telephone number. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, and their level of education or income. The GRM does not use complex processes that create confusion or anxiety.
- **Responsiveness and efficiency**: The GRM is designed to be responsive to the needs of all complainants. Accordingly, staff handling grievances are trained to take effective action, and respond quickly to grievances and suggestions.

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

- **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken is swift, decisive, and constructive.
- **Participation and social inclusion:** A wide range of stakeholders are encouraged to bring grievances and comments to the attention of the Project staff. Special attention is given to ensure that marginalized or vulnerable groups, including those with special needs, are able to access the GRM.

8.3 GRM Value Chain

Step 1: Grievance Uptake: Multiple channels must be available for stakeholders to file their complaint, grievance, or feedback. The stakeholder must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

Means of Filing a Grievance

There are four distinct means, at least two of which must be made available at the sub-project locality for people to file a grievance (see complaints log, complaints form and grievance register,

1. **A phone number for a hotline operator**: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator should be available from 8.00 am to 5.00 pm every day. The hotline operator is set up and managed by the PIU. Any concerned party can call the hotline number and file a grievance with the Project.

2. **A help desk** will be set up during the implementation of sub-project activities in a specific locality, especially where construction activities are undertaken. It should be manned by the implementing staff, in close coordination with local authorities. At the help desk, stakeholders can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk.

0. **Relevant assigned personnel** available in each project site will be required to accept grievances and ensure that avenues for lodging grievances are accessible to the public. The first point of contact for all potential grievances from community members may be the contractor or a local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance.

0. **A suggestion box** will be installed at the nearest sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the suggestion box must be expressed in writing.

1. Email or a web-based submission form, this form will be available stakeholders sensitized on how the applicable email address and web page by the PIU

8.4 GBV/SEAH-related Grievance

Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on SEA/SH-related grievances. No grievance uptake mechanism can reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of SEA/SH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centered approach from mandatory reporting.

The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor's informed consent – report the case to one of the Project's formal GRM. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

The grievance recipient will be responsible for the recording and registration of the complaint. A GRM operator cannot reject a SEA/SH complaint. At the same time, however, the project can only respond to a SEA/SH complaint if it is directed into the designated GRM channels.

Confidentiality: All grievance recipients and anyone handling the SEA/SH-related grievances must maintain absolute confidentiality in regard to the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. There are exceptions under distinct circumstances, for example a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others, in which case referrals to lifesaving services should be sought; b) if the survivor is a child and there are concerns for the child's health and safety. The survivors need to be informed about these exceptions.

Informed Consent: The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up. Asking for consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or IPs or PIU), and/or to undertake any action (for instance investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on. In the case of children, informed consent is normally requested from a parent or legal guardian and the children

Incident reporting: Severe incidents (defined as an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, for example: serious injuries, fatality, GBV, forced or child labor, damage on Project infrastructure, as well as organized large scale robbery, looting etc., abuse and cases of mistreatment of communities and/ or workers by security forces (including GBV/SEA/SH, spread of communicable diseases among workforce, kidnapping, etc), will be reported within 48 hours to the PIU and onwards to the World Bank.

At all times, the PIU will provide feedback promptly to the aggrieved party, for example through the phone. Feedback is also communicated through stakeholder meetings and beneficiary meetings during project activities. For sensitive issues, feedback is given to the concerned persons bilaterally. Steps listed below provide clarity on of the process.

Step 1: Receipt of Grievances: Records of all feedback and grievances reported will be established by the PIU. All feedback is documented and categorized for reporting and/ or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible, should include the name of the person providing feedback as well as the county, (where applicable), the project activity and the nature of feedback or complaint.

Step 2: Sort and Process: All registered grievances will be transferred to the PIU GRM Officer – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM Officer will categorize the complaint. Worker-related grievances will be handed over to a workers' GRM. Where grievances are of sexual nature, the focal point has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the SEA/SH Action Plan. Dedicated training on how to respond to and manage complaints related to SEA/SH will be required for all GRM operators and relevant project staff.

Where grievances can be handled locally, the GRM Officer will return these grievances to the appropriate local structures to be handled by existing dispute settlement mechanisms. However, these can only be involved if the GRM Officer assesses that the complainant is not a member of a vulnerable group or minority that would not be catered for by the local mechanism in an equal manner.

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

The GRM Officer will also transfer the grievance information into a more comprehensive grievance register.

GBV/SEA/SH

All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution (see specific SEA/SH reporting form, Annex 5).

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

still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded and the case will be considered closed.

If the survivor provides informed consent, the grievance recipient should inform the GRM Specialist. The GRM Specialist at the PIU will inform the World Bank. The report will be on the anonymized incident as soon as it becomes known to the PIU. Data shared will include the nature of the allegation; if the alleged perpetrator is associated with the Project; the survivor's age and sex' and whether the survivor was referred to other services. The Project's SEA/SH Action Plan has mapped all referral services in the different counties designated for interventions. The project team will keep an updated list available of these services.

Step 3: Acknowledgement and Follow-Up: The PIU will decide whether a grievance can be solved locally, with local authorities, contractors, or NGOs, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Officer the appropriate individuals that could be addressed with the case, if the case can be solved at the local level. At all times, the GRM Officer will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

GBV/SEA/SH

Referrals are a process through which the survivor gets in touch with professionals and institutions regarding her case. Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The grievance recipient will instantly provide the survivor with contacts of the available referral services in the respective area. If the survivor wishes for any assistance with transport or payment for services, the grievance recipient will provide allowances. Referral services are provided even in cases where the survivor opts to not pursue the case through the GRM or through legal channels.

The grievance recipient explains to the survivor his or her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information. The survivor will be informed about his or her right to place limitations on the type of information they want shared. The survivor's consent must be documented.

Step 4: Verify, Investigate and Act: The GRM Officer will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redressing action and plan.

Verification: Check for eligibility (objectively based on set standards and criteria) of the complaint in terms of relevance to the project; escalate outright grievances that require high level interventions; refer outright grievances that are outside the project jurisdiction (e.g., refer to PIU Project Manager or relevant external institution)

Once eligibility is determined, the GRM Officer will categorize the complaint into defined categories:

Investigation:

- GRM Officer to appoint an independent investigator (E&S Specialists, professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)
- Collect and preserve evidence
- Analyze to establish facts and compile a report

Grievance Action Plan

- Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction
- undertake mutually agreed follow-actions
- Update of complainant
- Provide complainant with a grievance redress status update and outcome at each stage of redress, (iii) update the IP or PIU on grievance redress across the GRM value chain.

GBV/SEA/SH

The PIU GRM Specialist will be the key focal point for management of such grievances and concerns and will work closely with respective GBV Specialist counterparts at the Ministry of Gender and Social Welfare. Once a case has been taken in by a GRM recipient, and informed consent of the survivor is obtained to proceed with the case, the case file will be submitted to the GRM Specialist. The GRM Specialist will first ensure that the survivor has been provided with all necessary GBV referral services, and will ensure that the survivor is in safety.

Where the SEA/SH grievance was allegedly committed by a project worker, the grievance will be reported to the respective employer. The GRM Specialist will follow up and determine the likelihood that the allegation is related to the project. The GRM Specialist will follow up and ensure that the violation of the Code of Conduct is handled appropriately, e.g., the worker is removed from his or her position and employment is ended. The responsibility to implement any disciplinary action lies with the employer of the alleged perpetrator, in accordance with local labor legislation, the employment contract, and the code of conduct. The GRM Specialist will report back to the survivor on any step undertaken and the results.

Where the survivor has opted to take a formal legal route, the GRM Specialist will ensure that the survivor has all the support required to file a case at court. The GRM process will still proceed with the survivors' consent. Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GRM's remit to conduct investigations, to make any announcements, or to judge the veracity of an allegation. The GRM should refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received.

Since this project assumes a fully survivor-centered approach, no information can be passed on without the consent of the survivor. If the survivor does not wish for the case to be pursued, the survivor shall be offered

access to referral services and the GRM Officer should note that the survivor did not wish for the case to be pursued, and the case is considered solved.

Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions; and appropriate actions have been taken against the perpetrator; b) the service provider has initiated accountability proceedings with the survivor's consent.

If the survivor does not want to launch a complaint with the employer, the case is closed. If the complaint proceeds, the case is reviewed by the GRM Specialist and a course of action is agreed on with the respective employer. The alleged perpetrator's employer takes agreed-on disciplinary action. Once the action is deemed appropriate by the GRM Specialist, the case is recorded as closed.

Step 5: Monitor, Evaluate and Provide Feedback: The GRM Officer will provide feedback to GRM users and the public at large about: results of investigations; actions taken; why GRM is important; enhance the visibility of the GRM among beneficiaries; and increase in users' trust in the GRM.

The PIU will undertake the following monitoring actions: develop indicators for monitoring the steps of GRM value chain; track grievances and assess the extent to which progress is being made to resolve them; conduct a stakeholder satisfaction survey for the GRM services; conduct analysis of the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact; provide a report on grievance redress actions pertaining to the steps of GRM value chain.

The PIU will evaluate the GRM by: analyzing grievance data to reveal trends and patterns; sharing GRM analysis in management meetings; and taking corrective action on project implementation approaches to address the grievance

EA-RDIP Somaliland GRM Channels

- Focal point: Social Specialist
- Email: grm@eardipsomaliland.com
- Phone: 252 63 8555593
- Suggestion box: available at EA-RDIP offices
- Website: https://mict.govsomaliland.org/articles/environmental-and-social-commitment-plan-escp-2
- Facebook: https://www.facebook.com/share/1E7DrJ6bAF/
- WhatsApp: 252 63 8555593

8.5 WB's Grievance Redress Service (GRS)

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

9 STAKEHOLDER ENGAGEMENT / CONSULTATION AND DISCLOSURE

9.1 Overview

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. For this reason, stakeholders' engagement must be started early in the project cycle because it guarantees the 'social license to operate' by signaling to communities and other local stakeholders that their views and well-being are considered important.

In this section, consultations with key stakeholders with regards EA-RDIP – Somaliland, and the implementation of project components is documented as presented the SEP. A Stakeholder Engagement Process was developed in order to achieve proper stakeholder identification and mapping. The process is further detailed in the stand-alone SEP. The objectives focused on obtaining the views of relevant stakeholders on subject matter relating to proposed activities

9.2 Stakeholder Inventory

Table 9-1 below summarizes the potential role, interests, and influence for each of the stakeholder groups for the project. There are several categories of persons and institutions that will need to be consulted and engaged in the project activities across all regions where project activities are conducted

Table 9-1: Stakeholders Inventory

Community	Stakeholder Group	Key Characteristics	Summary of interest	Language requirements	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings etc.)
Regional Level	Regional bodies / RECs	Affected Parties	Will support development of regional frameworks to be implemented at national level. Somaliland currently a member of IGAD and has applied for EAC membership.	English	Engagement via project activities an institutional arrangement in proposed.	N/A
	South Sudan	Affected Parties	Other countries under phase 1 of the project		Engagement via project activities an institutional arrangement in proposed.	

	Other countries in East Africa	Affected Parties		English	Engaged via RECs	N/A
National Level	Ministries Department and Agencies (MDAs) – GoSL level (e.g., Ministry of Commerce and Industry, Ministry of Public Works, Ministry of Finance, Central Bank of Somaliland, National ID agency)	Affected Parties	Project updates, communications on those activities that relate to their specific mandates	Somali	Memo/letter, email, telephone calls, in-person meetings	Meetings on at least semi-annual basis, hand-outs.
	Business Associations and Digital Businesses	Interested Party	Digital services and innovation ecosystem updates from the relevant project components; business opportunities	Somali	Memo/letter, website, email, telephone calls, in-person meetings	Meetings on at least semi-annual basis, hand-outs.
	Education sector – digital skills providers (Higher education institutions)	Affected Parties	Opportunities related to how the project can benefit them through SomaliREN, contracting opportunities for potential performance-based grants	Somali	Email, website, telephone calls, in-person meetings	Face to face meetings on a regular basis.
	Telecom Operators (MNOs, ISPs etc.)	Interested Party	Information on PPP arrangements	Somali/English	Email, telephone calls, in-person meetings	Face to face meeting on a regular basis.
	Telecom Regulator: NCA	Affected Party		Somali	Email, telephone calls, in-	Face to face meeting on a regular basis.

					person meetings	
	Construction Companies	Interested Party		Somali	Website, emails	
	Donor Partners and Multilaterals (AfDB, EU, USAID, DFID, SIDA)	Interested Party	Information and updates on the project to avoid development aid overlap, impact, etc.	English	Website, emails, in-person meetings	
	International NGOs	Interested Party		English	Website, emails	
Local Level	Region/District level	Affected Parties		Somali and locally applicable languages	Email, telephone calls Face-to-face meetings, radio	Need for close coordination and information sharing for smooth implementation.
	Municipal leadership	Interested Party		English and locally applicable languages	Email, telephone calls Face-to-face meetings, radio	Very important body - link between the community, the county and development partners. Contact should be initiated on a regular basis during implementation
	Local leadership	Interested Party		Locally applicable languages	Email, telephone calls Face-to-face meetings, radio	Regular contact
	Women and girls	Vulnerable Group		Locally applicable languages	Face-to-face meetings at community level, notice boards, radio	May be illiterate, methods must cater for that.

						Child care needs
	Vulnerable Households	Vulnerable Group		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	Cannot afford services at high cost and may be illiterate
	Youth	Vulnerable Group		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	Need to be empowered and should therefore be well as being integrated into consultations
	IDPs and Returnees	Vulnerable Group		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	May find that their place of origin or home is occupied by other people
	Ethnic minority groups	Vulnerable Group		Somali and locally applicable languages – in particular language of the minority group	Notice board, Face-to-face meetings at community level, radio	Feel marginalized and mechanisms need to be in place to empower and involve them in productive endeavours
	Persons with disabilities	Vulnerable Group		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	May require different engagement methods to cater for disability and allow information to reach them
	General community members	Potentially Influencing Party		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	Need to have clear information dissemination in order to be inclusive

9.3 Consultation

Stakeholder consultation formed part of the methodology in preparing this ESMF where the project interested and affected stakeholders who could be identified at this early stage were consulted. The stakeholder consultation was significant to the preparation of this ESMF and formed the basis for the determination of potential project impacts and design of viable mitigation measures. The issues raised and concerns expressed including possible mechanisms of addressing these issues and concerns are presented separately under the stakeholder Engagement Plan (SEP) and summarized in Tables below.

Key MDAs at GOVERMENT level

Table 9-2: Summary of consultations held with Ministry of Commerce and Industry on 23rd November 2022

No	Issues/Point Raised	Responses
1	The MOTT welcomed the EARDIP initiative and thanked the Ministry for engaging the team in early discussion. The team confirmed their commitment to support as and where necessary and requested to be continually informed on how to actively participate and support direct initiatives.	The Ministry thanked the team for their participation and assured its commitment to continue feedback and loop-in MOTT on initiatives as they further develop and commence.
2	The MICT noted the significance of building E-commerce/digital trade and other trade facilitation regulations, policies and strategies. MOTT welcomes the initiatives highlighted in the presentation on data protection law, consumer protection, cyber security and their overlap and significance to support and build an enabling reforms environment for the country. The MICT requested further details beyond concept on how beneficiary countries implement the project and how the two ministries (MICT and MOTT) may collaborate on implementation. The Ministry is happy to share existing documents and ongoing initiatives with the MOTT.	The team explained that South Sudan and Somaliland are beneficiary countries of EARDIP. The team highlighted there is a proposed Technical Assistance (TA) for capacity building for MOTT and development of E-Commerce strategy and implementation road map and MOTT engagement in this from the initial stages is crucial. Further documents on his will be shared in due course.

Private sector

Table 9-3: Summary of consultations held with telecoms operators on 12th November 2022

No	Issues/Point Raised	Responses
1	The participants welcomed the project initiatives and objectives. The participants noted their support for further engagement as the project implementation commences. Requested to the Ministry to be further engaged and updated.	The Ministry thanked the participants on their positive feedback on this initial consultation to introduce the new EA-DRIP initiative. The Ministry assured its commitment to continue to work with the private sector and update on how the private sector and other stakeholders will be engaged as implementation begins. Mode of communications was agreed to be through email, direct telephone and formal meetings. This includes overall sector engagements.
2	Some of the participant organizations noted their keen interest for further information on how to actively participate and support the	The project team assured that private sector participation and engagement is a key for several aspects of the project and will reach out in due course

	government. Explore areas of potential collaboration.	as project plans are further developed, refined and initiated.

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Education sector
Consultations took place with the Somaliland Research and Education Networks (Somali-REN)

Table 9-4: Summary of consultations with SomaliREN on August 31, 2022.

No	Issues/Point Raised	Responses
1	SomaliREN member institutions expressed appreciation for their inclusion in the EA RDIP project and the predecessor ICT sector support project. They also attributed the success of the NREN to the World Bank support under the ICT sector support project.	MICT acknowledged the success of SomaliREN as an NREN and its contribution to the Somali higher education sector.
2	SomaliREN members expressed concern over how the UbuntuNet Alliance has unfairly priced connectivity for SomaliREN under the previous project. The 20% contribution to the AfricaConnect 3 project which the EA RDIP project will support might not be effectively used unless serious negotiations are made with the UbuntuNet Alliance.	MICT requested that SomaliREN management and the World Bank team engage with the UbuntuNet Alliance on the state of the previous engagements and how this counterpart funding by the project will be used. The prices of connectivity have gone down and should be reflected in the subsequent agreements.

Table 9-5: Summary of consultations with *NFOC and Telecom Operators (September 9, 2025)*

No	Issues/Point Raised	Responses / Agreed Actions
1	Priority Fiber Optic Routes: The meeting discussed the selection of priority routes for deployment. Key routes identified included Burco–Ceerigaabo (280km) to cover the unserved Sanaag region, and Berbera–Hargeisa due to its economic importance as a cable landing gateway.	Prioritization Agreed: The stakeholders agreed on the priority ranking: 1. Burco – Ceerigaabo 2. Berbera – Hargeisa 3. Wajaale – Buuhoodle (Critical for cross-border connectivity). NFOC committed to sharing the consolidated map designs for these routes.
2	Cost Estimation: Operators presented preliminary cost estimates for the priority routes. However, clarification was needed regarding what costs should be included (e.g., E&S and Security).	Revision of Estimates: It was agreed that operators would revise and resubmit estimates focusing only on route deployment and logistics, excluding Environmental & Social (E&S) assessment and Security Risk Management (SRM) costs, which are covered separately by the project.
3	Private Sector Contribution (Last Mile): There was a need to define the specific financial or	Commitment Secured: Telecom Companies (Telesom, Somcable, and Somtel) agreed to take full

	infrastructure contributions expected from the Internet Service Providers (ISPs).	responsibility and cover the cost of Last Mile deployment across all three priority routes.
4	Project Governance & Coordination: Operators suggested the need for a formal body to support smooth implementation and avoid delays.	Steering Committee: It was agreed to establish a Steering Committee comprising MICT, NFOC, ISPs, and the EA-RDIP PIU to oversee implementation and conduct regular meetings.

Table 9-6: Summary of consultation with SomaliREN and Universities (September 23, 2025)

No	Issues/Point Raised	Responses / Agreed Actions
1	Implementation Roles & Delays: Participants emphasized the need for clarity on universities' specific activities. They suggested that directly involving universities in implementation could mitigate delays often caused by limited ministerial capacity. Concerns were also raised regarding potential delays caused by World Bank processes.	Follow-up Planned: The PIU acknowledged the need for role clarity. It was agreed to convene a specific follow-up meeting in October 2025 to discuss and refine the project workplan. The Minister urged stakeholders to accelerate preparations given the limited project timeframe.
2	Infrastructure & Connectivity Needs: Through group work, University Presidents and ICT Directors identified critical priorities: last-mile fiber deployment to campuses, establishment of data centers, LAN connectivity, and provision of dedicated bandwidth (1-2 Gb).	Integration into Design: The EA-RDIP Coordinator confirmed that universities would directly benefit through last-mile access. The PIU committed to discussing these presented priorities with the World Bank Team to provide feedback and ensure alignment.
3	Digital Skills & Inclusion: Stakeholders prioritized ICT literacy programs (e.g., ICDL), capacity building for lecturers, and specifically addressing the gender digital divide through student gender assessments and skills training.	Commitment to Capacity Building: The project's Component 3 was presented as the vehicle for these activities. The meeting reaffirmed the commitment to bridging the skills gap and addressing gender disparities in digital access.
4	Data Security & Legislation: Concerns were raised regarding data security in inter-university information sharing and the status of ICT-related legal documents at the government level.	Clarification: The Coordinator acknowledged gaps in national ICT legislation due to parliamentary delays but urged SomaliREN members to maintain focus on shared operational priorities despite legislative challenges.
5	Coordination: The need for a streamlined communication channel between the project and the various universities was identified.	Focal Points: It was agreed that SomaliREN members would formally appoint university focal points by October 2025 to facilitate effective communication with the PIU.

Table 9 -7: Summary of consultation on Draft Legal Framework Gap Analysis Report (October 9, 2025)

No	Issues/Point Raised	Responses / Agreed Actions
1	Missing Key Legislation: It was highlighted that critical legal instruments, specifically the ICT Act and the Fiber Optic Act, are currently missing and require urgent attention. Participants emphasized the need to prioritize these Acts as the foundation for subsequent policies and regulations.	Prioritization Strategy: The meeting identified a list of 20 priority regulations to focus on, including the Post and Telecommunications Act (Amendment), Broadband & Fiber Optic Infrastructure Regulation, and E-Waste Management Regulation. It was agreed to focus first on developing the Acts.
2	Strategic Alignment: The Ministry's current Five-Year Strategic Plan is nearing completion. There is a need to align the legal framework with the redevelopment of the new Strategic Plan for the period 2026–2030.	Integration: The Ministry 5-year Strategic Plan (2026 – 2030) was identified as the top priority in the list of regulations/strategies to be developed to ensuring alignment with national development goals.
3	Review of Draft Report: Participants reviewed the draft report and suggested that specific titles of regulations needed updating and that the "missing regulations" section was incomplete.	Action Plan: The Technical Advisor was assigned to: 1. Complete the missing regulations and update titles by October 15, 2025. 2. Incorporate the prioritized regulations into the final report by October 23, 2025.
4	Consultation Timeframe: Although the report was initially expected to be finalized by October 1st, participants agreed that additional time was required to gather comprehensive input from various departments.	Timeline Extension: It was agreed to extend the timeline. Departmental directors will provide specific inputs to the Technical Advisor. A final draft will be circulated to departments for input by October 25, 2025.

Table 9 - 8: Summary of consultation with Neighboring Stakeholders on PIU Office Construction (December 4, 2025)

No	Issues/Point Raised	Responses / Agreed Actions
1	Mosque Operations & Security: The Imam of the Ministry Mosque emphasized the need for a clear boundary demarcation between the new office and the mosque. He requested the installation of CCTV cameras for security and suggested that the women's prayer section be incorporated within the mosque structure rather than the new office building.	Design & Safety Assurance: The PIU confirmed that construction would not disrupt mosque activities as there is an alternative entrance. The advice regarding the women's section and CCTV security measures was noted for incorporation into the final site management plan.
2	Traffic Management & Congestion: Representatives from the Red Crescent raised concerns about traffic congestion caused by construction vehicles. The Telesom Electricity Company (TEC) also highlighted access issues.	Alternative Access Route: TEC offered collaboration by providing access through their garage as an alternative route to the Ministry premises to alleviate congestion at the main gate. The PIU committed to

		implementing a strict Traffic Management Plan.
3	Noise & Disturbance: The Siilaanyo National Library representatives expressed concern regarding construction noise, noting that the library requires a quiet environment for students and readers.	Noise Mitigation: The meeting agreed on the importance of managing noise levels. The PIU will coordinate construction schedules (e.g., restricting high-noise activities during peak library/prayer hours) to minimize disturbance.
4	Coordination with Other Projects: The Ministry's digitalization team noted that another construction project (Taiwan/ICDF Data Center) is already underway, raising concerns about cumulative impacts.	Joint Coordination: It was agreed to coordinate efforts between the EA-RDIP construction and the Taiwan-supported project to manage cumulative impacts effectively.
5	Safety & Security: Concerns regarding electrical safety measures (raised by TEC) and general site security (raised by the Security Officer) were discussed.	Compliance: The PIU confirmed that the new building design will meet high standards, including electrical safety measures and support for site security personnel.

Table 9 - 9: Summary of Technical Stakeholder Consultation on Universal Access (December 15, 2025)

No	Issues/Point Raised	Responses / Agreed Actions
1	Coordination & Access for Fiber Rollout: The Minister and Project Coordinator emphasized that the successful deployment of fiber optic infrastructure along priority routes relies heavily on government institutions providing access and facilitating coordination with telecom operators.	Institutional Support: Government institutions agreed to support access and coordination along priority fiber routes. The PIU emphasized that timely collaboration is critical to prevent implementation of bottlenecks.
2	Universal Access & Data Requirements: The meeting highlighted the need for accurate baseline data to measure the project's "Universal Access" objectives and Key Performance Indicators (KPIs). Participants engaged in group work using questionnaires to provide institutional inputs.	Data Submission: Participants provided initial technical inputs via structured questionnaires. It was agreed that stakeholders would promptly complete and submit any outstanding questionnaire data to the PIU for integration into the M&E framework.
3	Institutional Focal Points: The Director General noted that effective daily coordination requires specific contact persons within the partner organizations, particularly the private sector.	Nomination of Focal Points: It was agreed as a key action point that Telecommunications operators will formally nominate official project focal points to facilitate effective coordination and communication.
4	Security & Operational Risks: The closing remarks highlighted the need to be mindful of security considerations and other contextual factors in the deployment areas.	Enhanced Coordination: All parties agreed to enhance coordination mechanisms, specifically considering security and operational risks during the physical deployment phase.

10 APPENDICES

APPENDIX 1:
ENVIRONMENTAL AND SOCIAL RISK CATEGORIES AND SCREENING TEMPLATES

Risk Category

Risk Category	Nature of Risk and Impact	Examples
Category D: Low Risk	Activities that do not have a physical footprint. These will not require E&S instruments preparation, however, E&S clauses in the contract are recommended (to be prepared by the PIU prior to bidding process)	Foot paths; Purchase of furniture for existing health clinics, haffirs for animal and human consumption; communication and translations; Small training and workshops; management of funds and grants; management of social protection activities
Category C: Moderate Risk	Activities that have low to medium E&S risks and impacts, including that are site specific, temporal and reversible in nature. In addition to the E&S clauses in the contract, these activities may require an ESIA that will collate findings into a detailed ESMP. Contractors will also be required to prepare C-ESMPs. Furthermore, activities may require risk mitigation measures laid out in the GBV Action Plan, Security Management Plan, Labor Management Procedures, Pest Management Plan, etc (see screening template)	Construction or repair of non-motorized hand-pumps and boreholes (boreholes will be improvements or change to an existing water scheme); tanks; dug wells; provision or repair of latrines for public use; construction of flood protection infrastructure; repair of flood protection infrastructure; repair of small-scale community irrigation schemes; repair of small- scale irrigation schemes; rehabilitation of local roads; repair of local roads; culverts; bridges; repair or extension of existing health clinics; general buildings with local materials; markets; livestock dips; activities with security implication for all project workers and project-affected parties; activities with a risk of diversion of funds; activities that may spark conflict over allocation of resources; activities leading to involuntary resettlement, land acquisition and restrictions to land use; etc
Category B: Substantial	Activities that have substantial E&S risks and impacts, including those that are not as complex as high-risk projects, more temporary in nature and more predictable and reversible. This category includes risks of limited degrees of social conflict, and impacts on human security; impacts that are medium in magnitude, medium to low probability of serious adverse effects to human health and/or environment.	Activities that include potential security risks, such as delivery of goods to insecure areas; activities that could lead to GBV (e.g. labor influx)

Category A: High Risk	Subprojects that contain significant environmental and social risks impacts. These subprojects would require a full ESIA and a detailed ESMP. They would also require an ARAP or a RAP depending on the number of Project Affected Persons (PAPs) and resettlement impact anticipated.	dams; power stations; industrial installations (refineries, chemical installations); long distance roads, transmission lines (water, power); waste treatment and disposal installations; large water and wastewater treatment plants; river basin or land development; large-scale irrigation; projects in critical habitat and protected areas; projects involving significant quantities of hazardous substances; industrial installations (refineries, chemical installations)

Exclusion List

- Sub Projects that involve the transformation or degradation of critical natural habitats and may result in the loss of biodiversity, including any official protected natural areas, such as national parks and other protected areas or can cause degradation of critical habitats.
- Sub Projects that within areas identified as at risk from flooding, rising water levels, landslides, ravines, fires, etc.,
- Sub Projects that that would damage non-replicable cultural property.
- Sub Projects that that in any way impact land owned or claimed by Historically Disadvantaged Local Communities and /or Indigenous Peoples without complete and documented free, prior and informed consent of such communities.
- Sub Projects that include activities that may have significant adverse social impacts and may give rise to significant social conflict between communities.
- Sub Projects that involve harmful or exploitative forms of forced labour / harmful child labour.
- Sub Projects that involve significant air emissions, harmful effluents, noise emissions above international standards, or represent potential physical, chemical, biological, and radiological hazards, or any threat to community health and safety that cannot be mitigated by the environmental and social instruments proposed in this ESMF.

E&S SCREENING TEMPLATE

Environmental and Social Screening Template				
SECTION A: General Information				
Date of screening				
Activity/Sub project title				
Activity/Sub project component				
Implementing Partner				
Proposed activity budget				
Proposed activity duration				
ES Screening Team Leader and Contact Details				
ES Screening Team Members				
Site/Activity location				
New/Rehabilitation project				
Project Description. Briefly describe project activities, activities that interact with the ES				
Categorize Project Activities into List A or List B or List C (see above)				
Information about actions needed during the construction including support/ancillary structures and activities required to build them, e.g. need to quarry or excavate borrow materials, laying pipes/lines to connect to energy or water source, need to open an access road etc A description of the location, siting, current land uses, and soil occupation surroundings is required				

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Potential Environmental/Social Risks Impacts of Activities	Yes	No	I don't know	If these risks ('yes') are present, refer to:	Comments
Risk Category *(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)*					
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is there a risk of diversion of project benefits?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity?				Security Management Plan (SMP)	
Is there a risk that project benefits may not reach truly vulnerable populations?				Floods Impact Needs Assessment (FINA) Stakeholder Engagement Plan (SEP)	
Is there a risk that the activity will cause population influx from neighbouring areas?				Floods Impact Needs Assessment (FINA) Stakeholder Engagement Plan (SEP)	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?				Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
Are there are any new projects in the vicinity of the sub-project that could contribute to cumulative impacts.				ESMF Provisions	
ESS 2: Labour and Working Conditions					
Does the activity include any of the known labor rights / ESS 2 non-				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	

compliance risks in Somaliland (child and forced labor)?					
Does the activity include a construction component?				Labor Management Procedures (LMP) C-ESMP Occupational Health and Safety Plan (OHS)	
Does the activity include labor-intensive manufacturing?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include primary agricultural activities?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Will the activity require a larger contractor workforce?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for Project Workers?				Security Management Plan (SMP)	
Is there a risk of lacking OHS for workers at the construction site?				Occupational Health and Safety Plan (OHS) Pest Management Plan (PMP)	
Is there a risk of delayed payment of workers?				Labor Management Procedures (LMP)	
Is there a risk that workers are underpaid?				Labor Management Procedures (LMP)	
Is there a risk that women will not be included in deployment in equal numbers?				Labor Management Procedures (LMP) GBV Action Plan	
Does the activity/sub-project include the recourse to community workers? Will the infrastructure works require a worker's camp? If "Yes", how many workers are expected to occupy the camp?					
Are the infrastructure works' activities prone to natural hazards,					

risks and could result in accidents and injuries to workers during construction or operation?					
Does the activity/work require the use of pest management technique that could affect the agriculture and /or public health?					
ESS 3: Resource Efficiency and Pollution Prevention Management					
Will the activity result in the production of solid waste? (directly by the project or by workforce)				Waste Management Plan, based on *WBG Environmental, Health, and Safety General Guidelines* Pest Management Plan (PMP) C-ESMP	
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceutics, industrial chemicals, ozone depleting substances)				*General Guidelines* Pest Management Plan (PMP) C-ESMP	
Will the activity result in the generation of dust a noise?				C-ESMP	
Will the activity result in soil erosion?				C-ESMP	
Will the activity produce effluents (waste water)?				C-ESMP Waste Management Plan	
Will the activity result in increased levels of vibration from construction machinery?				C-ESMP	
Will the project produce air pollution? (e.g. significant greenhouse gas emissions, dust emissions and other sources)				C-ESMP	

Will the activity disturb any fauna and flora?				C-ESMP	
Will the activity result in irrigation water with high TDS with more than 1,500 ppm?				C-ESMP Waste Management Plan	
Can the project affect the surface or groundwater in quantity or quality? (e.g. discharges, leaking, leaching, boreholes, etc.)					
Will the project require use of chemicals? (e.g. fertilizers, pesticides, paints, etc.)					
Is there any risk of accidental spill or leakage of material?					
ESS 4: Community Health and Safety					
Is there a risk of community exposure to pesticides?				Pest Management Plan (PMP)	
Is there a risk of communal drinking water pollution through pesticides?				Pest Management Plan (PMP)	
Is there a risk of increased GBV/SEAH cases due to labor influx?				GBV/SEAH Action Plan Labor Management Procedures (LMP)	
Is there a risk of spread of communal diseases due to labor influx?				Labor Management Procedures (LMP) C-ESMP	
Is there a security risk to the community triggered by project activities?				Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the activity include payments or cash transfers?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	

Will the activity expose community members to physical hazards on the project site?				C-ESMP	
Will the activity pose traffic and road safety hazards?				C-ESMP	
Will the activity include debris removal that may pose a safety hazard for the community?				Waste Management Plan	
Is there a possibility that the activity contaminates open wells?				Waste Management Plan C-ESMP	
Is there a possibility that the activity spreads pathogens and other pollutants (e.g. latrines)				Waste Management Plan C-ESMP	
Can the activity contribute to the spread of disease (eg health facilities)?				Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the displacement / resettlement affect IDPs?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	

Would the project potentially discriminate against women and girls based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to disputes over land ownership?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to blocked access to people in the area?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity require acquisition of land or physical buildings or infrastructure?					
Will the activity requires voluntary land donation? If yes, can all ESS 5 principles on this matter be respected and documented?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Did any resettlement occur prior to land acquisition? If so, is there any pending land disputes? Are there any significant legacy issues?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Will the activity impact sensitive areas?				C-ESMP and ESMF provisions	
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes,				C-ESMP and ESMF provisions	

water consumption and contamination?					
Is there a risk that the activity causes loss of precious ecological assets?				C-ESMP and ESMF provisions	
Is the sub-project area (or components of it) located within/adjacent to any protected areas designated by government (national park, national reserve, world heritage site etc.)?				C-ESMP and ESMF provisions	
Are there wetlands (swamp, seasonally inundated areas) that could be affected? Are there any critical, natural habitats, environmentally sensitive areas or threatened species that could be significantly converted/adversely affected due to the works?				C-ESMP and ESMF provisions	
ESS 8: Cultural Heritage					
Will the project be located in or close to a site of natural or cultural value?				Chance Find Procedures (ESMF)	
Is the project site known to have the potential for the presence of cultural and natural heritage remains?					
ESS 10: Stakeholder Engagement and Information Disclosure					
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?				Stakeholder Engagement Plan (SEP)	
Is there a historical exclusion of disabled persons in the area?				Stakeholder Engagement Plan (SEP)	

Is there a lack of social baseline data?				ESMF	
Is there a lack of community consultations by the government generally?				Stakeholder Engagement Plan (SEP)	
Are women likely to participate in decision-making processes in regards to the activity?				Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Is there a risk that the activity will have poor access to beneficiaries?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Will the Covid-19 outbreak hamper proper stakeholder engagement?				WB and NATIONAL guidance and regulations on Covid-19	
Has input from community members and those who may be affected by the works been sought?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Has the sub-project received overall stakeholder support including from vulnerable individuals and marginalized groups?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Is there any opposition to the activity/project?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
SUMMARY OF THE SCREENING PROCESS					
E&S Screening	**Results and Recommendation**				
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)		

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	Eg Land Degradation	**Low**	Rehabilitation of worked out areas.		
Is Additional Assessment Necessary? Evaluate the Risks/Impacts and reflect on options (see below)	**Screening Result**	**Summary of Screening Result Justification**			
	1. No further ES Assessment required.				
	2. No further ES Assessment required but requires simple ESMP.				
	3. Detailed ESMP. Done internally.				
	4. Detailed ESMP. Contracted to Consultancy.				
	5. ESIA required. Contracted to consultancy.				

E&S Screening	Results and Recommendation	
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Mitigation
	Eg Land Degradation	Rehabilitation of worked out areas.
	Eg Occupational Safety and Health	Use of appropriate PPE.
	Eg. Destruction of crops during trenching	Engage the Project Affected Persons. Trench off cropping season. Compensate fully where you cannot avoid.
Is Additional Assessment Necessary?	Screening Result	Summary of Screening Result Justification
	No further ES Assessment required.	
	No 2. No further ES Assessment required but requires simple ESMP.	
	Yes 1. Detailed ESMP. Done internally.	
	Yes 2. Detailed ESMP. Contracted to Consultancy.	
	YES 2. ESIA required. Contracted to consultancy.	

Next Steps	Screening Result	Action. Select applicable action consistent with the Summary of Risks. All end results of the screening and follow up tools should be disclosed at the appropriate level.
	No1. No further ES Assessment required.	Proceed to project implementation in compliance with LMP, GRM, GBV/ Action Plan, SEP.
	No 2. No further ES Assessment required but requires simple ESMP.	Produce the ESMP and submit it with Screening Form for review and approval by PIU. 2. Proceed to project implementation in compliance with LMP, GRM, GBV/ Action Plan, SEP.
	Yes 1. Detailed ESMP. Done internally.	Submit the Screening form with the TORs for the ESMP for review and approval by PIU. 2. Produce the ESMP and submit to PIU for review and approval by PIU. 3. Ensure the detailed ESMP mainstreams the LMP, GRM, GBV/ Action Plan, SEP. 4. Do not implement works until approval of the ESMP by PIU, World Bank.
	Yes 2. Detailed ESMP. Contracted to Consultancy	Submit the Screening form with the TORs for the ESMP for review and approval by PIU. 2. Engage a Registered ESIA Consultant to produce ESMP and submit to PIU first for initial review, then to World Bank for review and approval. 3. Ensure the ESMP mainstreams the LMP, GRM, GBV/ Action Plan, SEP. 4. Do not implement works until approval of the ESMP by PIU, World Bank.
	YES 2. ESIA required. Contracted to Registered Consultancy.	Submit the Screening form with the TORs for the ESIA for review and approval by PIU. 2. Engage a ESIA Consultant to produce ESMP and submit to PIU first for initial review, then to World Bank for review and approval. 3. Ensure the detailed ESMP mainstreams the LMP, GRM, GBV/ Action Plan, SEP. 4. Do not implement works until approval of the detailed ESMP by PIU, World Bank.

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APPENDIX 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 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 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.

ANNEX 3:
GBV/SEAH PREVENTION AND RESPONSE ACTION PLAN

(Presented as Separate Plan)

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ANNEX 4:
PROCEDURES FOR MANAGING CONTRACTORS DURING PROJECT IMPLEMENTATION STAGE

Managing Contractors during Project Implementation Stage

This procedure was developed consistent with the World Bank Group ESHS Guideline which incorporates the IFC ESHS Guidelines, under the "Good Practice Note: Managing Contractors' Environmental and Social Performance". This is to remind the borrower's responsibility to comply with the ESHS Guidelines, loan agreement commitments, ESIA, local laws and regulations, and permits and standards, ensuring that any contractor providing services of any kind to the implementing entity duly follows these requirements throughout the duration of the contract, including any activity or services performed by subcontractors or third parties undertaking a contract from the contractor.

The PIU may not have direct control over subcontractor performance, although it may have some influence over selection and will supervise their E&S performance. Therefore, the PIU must use their direct control over their contractors to ensure that E&S requirements are being met by subcontractors. To achieve this commitment, the implementing entity should require contractors to include in subcontracts the requirement to comply with all the relevant World Bank Safeguards standards and all E&S requirements that are appropriate for the works being subcontracted and consistent with the implementing entity's and the contractor's E&S management programs.

Understanding Implementation Responsibilities

The roles of the PIU and implementing partners / contractors in meeting E&S requirements are usually intertwined and must be worked out at the project level. Some actions described below as being the responsibility of the client or the contractor may be reversed or shared on some projects. In some cases, such as stakeholder engagement, both PIU and contractors will have certain obligations and limits and will need to coordinate their efforts. In others, such as monitoring, each party will monitor E&S performance, but at different frequencies and levels of detail. In all cases, the PIU remains ultimately responsible to World Bank for ensuring E&S requirements are met, with the responsibilities of the contractor defined in the contract. For design-build (or design-build-operate) contractors, the design standards and requirements (and operation standards) will also be set out in the terms of reference to the contract. For public-private partnership (PPP) projects the administration may also have roles and responsibilities (to the Bank) which may be additional to their usual regulatory functions.

Contractor Oversight

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. Clear responsibilities and reporting lines are essential to avoid duplication of effort or, conversely, gaps in monitoring. If operations are carried out under contract, or some work is performed by contractors, the PIU and contractor will monitor E&S performance during operations as well. Overall, the client will require that all contractors engaged on the project 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).

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.

E&S Performance Meetings

Regular meetings are essential to ensure contractor performance is satisfactory and that project specifications are being met. Experience has shown that the PIU may share performance-monitoring results at weekly meetings with all contractors to effectively drive improved performance by introducing a competitive element, sometimes with small incentives. The authority of monitoring staff who control contractor performance 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 for training programs, to ensure all staff are aware of E&S commitments and their part in meeting them.

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

The PIU is responsible for its contractors, meeting all of the project's E&S requirements, it is essential for them to review and approve 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.

Kickoff Meeting

Prior to early work activities, the PIU should hold a kickoff meeting with each of the contractors prior to arriving at the site. Timing of mobilization based on logistical issues, resources, customs delays, and so forth should be considered in the planning. The PIU and contractor 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 project-specific induction and training content. These meetings 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 client 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.

E&S Induction and Training

A general E&S site induction should be mandatory for all workers, with specialized technical E&S training delivered to staff. The degree of training should be based on the project's E&S risks, on the tasks that will be performed, the CoC, including the SEP, and SMP, and on the general E&S provisions that are applicable for all personnel, including contractors and subcontractors. All workers should be made aware of the worker GRM and Project GRM and how to access them. In particular, security contractors should be given detailed training on community engagement and the grievance mechanism, as complaints may be brought to their attention in the first instance, and as contractors are not often included in employee training. Contractors should develop and implement SEA and GBV awareness training for staff at all levels, from contract management to day laborers. Additional training may be needed for staff that will be responsible for implementing, monitoring, and reporting E&S performance. Once the general E&S induction is defined, a series of specific trainings may

be required in order to ensure that the requirements, controls, and mitigation measures are well communicated and understood.

PIU Monitoring of Activities

The monitoring of contractor E&S performance by the PIU must be the practice throughout construction, from mobilization through demobilization. This should involve both visits to work locations and reviews of records kept by the contractor and of reports submitted by the contractor. The frequency of site visits should be commensurate with the magnitude of the E&S risks of the activities being carried out and permanence of potential impacts that could result from ongoing activities. Monitoring may be conducted by PIU E&S staff.

The PIU environmental and social officers should review one or more recent inspection reports and the contractor's previous month's E&S progress report prior to visiting the site to monitor the contactor's E&S performance. They should do the same before participating in meetings where the contractor's E&S performance is to be discussed. The PIU will review contractor reports and follow up as needed to ensure timely resolution of issues of noncompliance with E&S requirements. This may include additional visits to the contractor's site or offices, further communications with contractor E&S personnel, issuance of notices of deficiency or warnings to the contractor, and other actions as needed.

At any stage of construction or other work, if the contractor has not taken appropriate action to achieve compliance with E&S requirements after repeated notices of violation and warnings of noncompliance, and significant E&S impacts are occurring or imminent, the PIU should order the contractor to stop work until E&S performance is brought under control and up to acceptable standards.

Contractor Monitoring and Reporting

The PIU should require contractors to monitor and keep records on E&S performance in accordance with the E&S management plans. This may include monitoring of E&S matters, scheduled and unscheduled inspections to work locations, observations made during routine activities, desk reviews, drills, and any other monitoring protocols implemented by the contractor to ensure E&S compliance. The PIU must be familiar with the contractor's monitoring and record keeping system so this aspect of the contractor's performance can itself be monitored.

Responsibilities for monitoring need to be clear between the client and contractor, and results (if client and contractor are both collecting data) must be comparable, for example, collected using the same methodologies, analyzed at the same labs, and using similar equipment, and so forth[36].

The PIU should require contractors to report on E&S performance on at least a monthly basis throughout the construction phase, including mobilization, construction, and demobilization. This could be more frequent for more sensitive E&S projects. It can be part of the overall technical progress report or a stand-alone E&S report. The table below shows the E&S parameters considered in the reporting of E&S performance.

[36] To improve efficiency, responsibilities should be defined early regarding who collects what data. In relation to the data collected by the contractor, the owner should be comfortable with what is being collected and how it is being collected, analyzed, reported, and so forth. This is usually done through the sign-off by the owner on the proposed monitoring plan of the contractor

Parameters to consider for E&S reporting by Contractor at least on a monthly basis

Item	Parameter	Description
1	*Safety*:	Hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
2	*Environmental incidents and near misses*:	Environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.
3	*Major works*:	Those undertaken and completed, progress against project schedule, and key work fronts (work areas).
4	*E&S staffing*:	New hires and departures, and listing of current staff and titles.
5	*E&S requirements*:	Noncompliance incidents with permits and national law (legal noncompliance), project commitments, or other E&S requirements.
6	*E&S inspections and audits*:	by contractor, engineer, or others, including authorities—to include date, inspector or auditor name,
7	*Workers*:	Sites visited and records reviewed, major findings, and actions taken, number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, and skill level (unskilled, skilled, supervisory, professional, management).
8	*Training on E&S issues*:	including dates, number of trainees, and topics
9	*Footprint management*:	Details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
10	*External stakeholder*	highlights, including formal and informal meetings, and information disclosure and dissemination—to include a
	engagement:	Breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups (e.g., disabled, elderly, children, etc.).
11	*Details of any security risks*:	Details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project or from inappropriate conduct from security forces employed either by the client or public security forces.
12	*Worker grievances*:	Details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.
13	*External stakeholder grievances*:	Grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender-disaggregated. Particular sensitivity may be needed around SEA or GBV issues raised.
14	*Major E&S changes*:	to E&S management, or E&S practices (most often done by the Project Implementing Entity)
15		actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or

	Deficiency and performance management:	Plans for actions to be taken—these should continue to be reported until the client determines the issue is resolved satisfactorily.
16	Key Mitigation measures implemented	The contractor will be required on a monthly basis to report key mitigation measures implemented as provided in the ESIAs and ESMPs

E&S Review of Contractor Invoices

The PIU should be part of the process for signing off on all payments to contractors, even if the payment is not for work that is explicitly related to E&S mitigation and performance. E&S staff shall work closely with the project manager (PIU or engineer's project manager, depending on who employs the E&S personnel) to determine if there are any outstanding E&S items and whether including that full or partial payment under specific line items of the bill of quantities should be withheld, either temporarily or permanently, or that there should be some combination of temporary and permanent withholding. This right should be exercised as follows;

- Temporary withholdings should be recommended in case of repeated minor violations of E&S requirements that are not leading to significant impacts on workers, external parties, or environmental resources; minor violations that are not corrected after repeated warnings; or first-time major violations that can be corrected easily and that have not led to permanent E&S impacts. The withheld amounts should be paid upon contractor correction of the deficiency to the client's satisfaction.
- Permanent withholdings should be recommended for minor violations that are not corrected after repeated warnings and that could result in significant impacts; or for any violations that have resulted in significant impacts, including permanent impacts. Some portion of such withholdings may be released upon satisfactory resolution of the issue, but some significant portion must be permanently withheld as a penalty to discourage repeated incidents.
- Payments that are withheld either temporarily or permanently will be all or part of the payment specified for a line item in the bill of quantities, which in turn will be the payment due for a discrete portion of the total works. The PIU should work with the project manager and others as needed to arrive at the amount to be withheld. This amount should not be based directly on the cost of compliance but rather should be somewhat higher than this amount, and based on a specific percentage of the line item in question.
- The contractor should be notified of the specific actions that must be taken in order to receive further payments for the works in question, or to receive payment that has been temporarily withheld.

If the contractor does not take timely action to reach compliance with E&S requirements, the PIU and the project manager should continue to take appropriate action to encourage compliance, which could include orders to stop work, withholding of further payments, and/or escalation of the issue to higher management. If significant impacts are occurring or imminent, the client may notify the contractor that another party will be brought in to deal with the issue and the payment to the contractor will be reduced by the amount paid to the other party, as would be specified in the contract.

ANNEX 5:
LABOR MANAGEMENT PROCEDURES
(Submitted as a Separate Plan)

ANNEX 6:
GENERAL QUARTERLY AND ANNUAL E&S REPORTING FORMAT

Summary of Key E&S Aspects during the Reporting Period

Project Status, E&S Incidents, E&S Changes, E&S Initiatives

Project Status

Provide a brief description of any new developments in relation to operations and facilities over the reporting period.

E&S Incidents

Please provide a summary of all the notifiable E&S incidents including the ones reported as provided by ESIRT, Please expand or collapse the table where needed.

Date	Incident description	Class	Reports sent to lenders	Corrective actions / Remedial plan

E&S Changes

Please provide a summary of all the notifiable E&S changes. Please expand or collapse the table where needed.

Date	Change description	Reports sent to lenders	Implementation status

Improvements/initiatives regarding E&S performance

Briefly describe improvements/initiatives implemented during the reporting period on management of &S aspects (e.g. energy/water savings, sustainability reports, waste minimization, etc.)

ESS1: Assessment and Management of Environmental and Social Risks and Impacts

E&S Impact / Risk Assessment

Have any supplemental environmental, social, health and safety impact/risk studies been conducted during the reporting period? (Please provide copies)

Compliance with Environmental and Social Management Plans

The status of the ESMP implementation should be described and any issues that remain outstanding should be detailed.

ESS2. Labor and Working Conditions

Human Resources Management

Have implementers and contractors changed/updated their Human Resource (HR) policy and procedures, Hr manual, and Health & Safety procedures, during the reporting period?

☐ Yes ☐No……

If yes, please provide details.

	# community workers	# direct workers	# Female direct workers	Turnover	# Contracted workers[192]
Previous year					
Reporting year					

Provide the following information regarding the workforce:

List the worker-related court cases and describe their status.

Occupational Health and Safety

Describe the main changes implemented in terms of Occupational Health and Safety (OHS) during the reporting period, e.g. revision of the OHS management procedures, action plans for technical improvements, leading/lagging indicators used/introduced, identification of hazards, new controls, etc.

Please attach Health & Safety audit reports available for the reporting period.

☐ Copies attached with this report ☐ Copies available upon request ☐Not Available

Accident Statistics Monitoring

Report TOTAL numbers for each parameter	This reporting period			Last reporting period (not cumulative)[37]		
	Community workers	Direct workers	Contracted workers	Community workers	Direct workers	Contracted workers
Total number of workers						
Total man- hours worked annual						
Total number of lost time occupational injuries[38]						
Total number of lost workdays[39] due to injuries						

[37] To be provided after the project has been operational for at least two consecutive years.

[38] *A lost-time injury* (LTIs) is the incapacity to work for at least one full workday beyond the day on which the accident or illness

[39] *Lost workdays* are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

Lost time injury frequency[40]						
Fatalities						
Vehicle collisions[41]						

Provide details for the non-fatal lost time injuries during this reporting period.

UNOPS/IOM / contractor/ Subcontractor employees?	Total workdays lost	Description of injury	Cause of accident	Corrective measures to prevent reoccurrence

Provide details for fatal accidents during this reporting period, if any, (and provide copies of accident investigation and respective corrective plan).

Date of Accident	Type of Accident	**Description of Accident**	**# of Fatalities**	**Preventive measures taken after the incident**

OHS Training

Describe Health and Safety training programs carried out in the reporting period.

Type of Training	Number of Persons attended	Time Training Held	Topics Trained

Workplace Monitoring

Please provide copy of any Workplace Monitoring reports developed for the reporting period.

ESS3. Resource Efficiency and Pollution Prevention

Environmental Monitoring

Provide copy of environmental monitoring data reports for this reporting period, collected consistent with the

ESMPs for the sub-projects.

Briefly describe environmental mitigation measures implemented during the reporting period to comply with E&S requirements

Resources Efficiency: Energy and Water

[40] The number of *lost time injuries* (LTIs) recorded for Project workers per million man-hours worked by them. LTI Frequency Rate = injuries per million hours worked = # of lost time accidents x 1,000,000 hours / total man-hours worked).

[41] Vehicle Collision: When a vehicle (device used to transport people or things) collides (comes together with violent force) with another vehicle or inanimate or animate object(s) and results in injury (other than the need for First Aid) or death

Provide data on energy and water consumption during the reporting period. If the data requested are available in another format, they can be submitted instead.

Describe the Concessionaires' resources efficiency measures/efforts being implemented to minimize fuel, energy, and water consumption.

Hazardous and non-Hazardous Waste[42]

Erosion Control, Slope Stability and Reinstatement

Please describe status and actions implemented in terms of erosion control, slope stability, and reinstatement within the project's footprint and area of influence.

ESS4 Community Health, Safety and Security

Community Health and Safety

Please list and describe any initiatives implemented in relation to community health and safety during the reporting period.

Please provide the list and description of the actions, the expected or actual dates of implementation, Progress/status, results obtained. You can use a tabular format (as below) or provide the information as an attachment of the report.

During the reporting period, have any emergency drills been conducted with participation of the local authorities, public emergency organizations, local communities? Are the communities aware of the emergency response plans?

Accident Reporting

Provide details for the non-fatal casualties, involving third parties, during this reporting period.

Date of Accident	Type of Accident	Description of the Accident	Number of people	Preventive measures taken

Provide details for fatal accidents during this reporting period (and provide copies of accident investigation and respective corrective plan).

Date of Accident	Type of Accident	Description of the Accident	Number of people	Preventive measures taken

GBV/SEA Action Plan

Please provide an update on the status and progress of the actions as defined in the GBV/SEA Action Plan. You may attach relevant monitoring reports.

ESS5 Land Acquisition and Involuntary Resettlement

[42] Waste types include but are not limited to: chemical containers, chemical sludge, containers/pallets, dewatered sludge, domestic waste, ferrous and non-ferrous scrap, hospital waste, laboratory waste, liquids, off-specification raw materials, paint waste, sludge, solids, truck and auto tires, waste fuel hydrocarbons, waste hydraulic fluids, waste lubricating hydrocarbons, waste solvents, waste treatment sludge, contaminated soil, creosote sleepers, etc

Report a summary status of RAP implementation activities

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Biodiversity Management

Please report on the mitigation measures included in the ESMF and ESMPs

As needed, using the table below describe any new activities or expansions that have increased the project footprint into new areas of habitat during the reporting period.

New Activity / Expansion	Total Area covered	Type of Habitat

ESS8 Cultural Heritage

Report if chance find procedures have been applied if not, please indicate Not Relevant.

ESS 10 Stakeholder Engagement and Information Disclosure

Stakeholder Engagement, Public Consultation and Disclosure

List any stakeholder engagement events, including public hearing, consultation and disclosure, liaison with non-governmental organizations, civil society, local communities on E&S.

Date	Participant(s)	Formats of Interaction	Issues Discussed	UNOPS response/ Agreement reached (attach minutes if any)	Actions Taken (if any)/ Remarks

Grievance Mechanism and Court Cases

Report the number and type of requests and/or grievances received from project affected people / local communities / local organizations

How many have been resolved and how many are pending? (Please attach a log of the grievance redress registry.

Report the number and type of court cases on E&S grounds, if any (Please attach a log of all court cases and their status)

ANNEX 7
WORLD BANK INCIDENT CLASSIFICATION GUIDE

Indicative

- Relatively minor and small-scale localized incident that negatively impacts a samll geographical areas or small number of people
- Does not result in significant or irreparable harm
- Failure to implement agreed E&S measures with limited immediate impacts

Serious

- An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources
- Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents
- Failure to remedy Indicative non-compliance that may potentially cause significant impacts
- Is complex and/or costly to reverse
- May result in some level of lasting damage or injury
- Requires an urgent response
- Could pose a significant reputational risk for the Bank.

Severe

- Any fatality
- Incidents that caused or may cause great harm to to the environment, workers, communities, or natural or cultural resources
- Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed
- Failure to remedy Serious non-compliance that may potentially cause severe impactsIs complex and/or costly to reverse
- May result in high levels of lasting damage or injury
- Requires an urgent and immediate response
- Poses a significant reputational risk to the Bank.

Official Use Only

ANNEX 8
INCIDENT REPORTING GUIDANCE
An incident report should contain the following information:

Incident Report Form

Please report any incident2 within 24 hours to the PIU

Implementing Partner	
Subproject / Activity	
Report Date	
Reported By (Name and Title)	

Details of Incident

Incident Date	
Incident Time	
Incident Place	

Identification of Type of Incident and Immediate Cause

Select the type of the incident from the list below. An incident can be classified at the same time as H&S/environmental/social.

Type of Incidence		
Health and Safety	**Social**	**Environment**
Moving Machinery/vehicles at project site	Damage to Cultural Heritage	Chemical/Oil Spill withimpact on population and/or environment
Hand Tools	Occurrence of infringement of labor rights	Improper Disposal Waste
Animals or insects	Occurrence of infringement of human rights	Disasters (Earthquake, Flood, etc)
Fire or Explosion at project site	Strike, demonstration	Water Pollution/ Sedimentation
Trips & smaller falls	Other (please specify)	Damage to ecosystems (e.g. damage to flora/fauna)
Drowning	Dust, Fumes, Vapours that impact the population and/or environment	Odor air Emissions
Borrow-pit Management		Dust, Fumes, Vapors, Air pollution with impact on population and/or environment
Noise		Other (please specify)
Temperature or heat		
Overexertion		
Structural Failure		
Chemical/biological		
Stress		
Other (please specify)		

For each type of incident, select the relevant descriptor(s) from the list. You can select up to 5 descriptors for each type of incident. If a descriptor is not listed below, please type in short descriptor in "Other". Add more rows as necessary.

Incident Type	Descriptor 1	Descriptor 2	Descriptor 3	Descriptor 4	Descriptor 5	Other
H&S						
Social						
Environmental						

Provide a description of the immediate cause of the incident:

Description of the Incident

Record all facts prior to and including the incident, if it was a planned activity, describe/list material, ecosystem and property damaged, etc:

Root Cause Analysis

Select the root cause(s) of the incident from the list below. If 'Other', please specify

Root Cause	Yes	No
Improper Planning		
Poor Maintenance		
Poor Supervision		
Poor Quality of Equipment		
No rules, standards, or procedures		
Lack of knowledge or skills		
Improper motivation or attitude		
Failure to comply with rules		
Other		

Additional Questions:

- Is the incident still ongoing or is it contained?
- Is loss of life or severe harm involved?
- What measures have been or are being implemented by the Implementer?

ANNEX 9
TERMS OF REFERENCE FOR ESIA

- **Information and scope of the consultancy**
- **Profile required**: consultants, with specialized expertise in Environmental and Social Impact
- Assessment of community infrastructure projects (hereinafter referred to as the "EIA team").
- **Location of works:** Somaliland
- **Duration of appointment**: xxx
- **Background**: xx details of activity xxx

Description of Work
Under the authority of the IP (name), and under the direct supervision of the state-PIU and the PIU the team will: Perform an analysis of the Environmental and Social Impacts of the activity and develop a management plan to avoid or mitigate the adverse impacts.

The objectives of the ESIA include:

- Source and present baseline information on the environment in the project areas, including the physical, biological and socio-economic conditions;

  - ✔ Assessment issues related to the determination of biodiversity conservation and sustainable management of living natural resources
  - ✔ Assess the overall environmental context as a baseline
  - ✔ Assessment of existing environmental / agricultural arrangements as relevant to the Project
  - ✔ Develop provisions for management of resource efficiency and pollution prevention

- Analyze and assess in detail the environmental and social impacts of the project in the areas of implementation;
  - ✔ Social assessment to better identify vulnerable groups, and social inequities
  - ✔ Conduct SGBV and Gender Equality and Social Inclusion Analysis and produce
  - ✔ GBV Action Plan
- Identify and refine the Environmental and Social Management Frameworks (ESMF) for the mitigation of the environmental impacts
- Identify requirements to the Labor Management Plan and further Health & Safety risks and refine ESMF accordingly
- Conduct legal analysis to ensure legal requirements for the Project are fully understood and the LMP and other provisions comply with Somaliland laws and World Bank ESS.
- Develop activity- or site specific ESMP.

Proposed methodology:

- Desk review of existing literature and studies
- Filed assessment
- Stakeholder consultations
- Data analysis
- Report writing (draft)
- Validation workshop
- Production of final report

Proposed scope and activities:

Activity 1: Context of the project:

- Describe, if any, environmental planning and management already been included in the project;

- Undertake a review of policies, legislation and regulations that will affect the EIA and the environmental management of the proposed works;

Activity 2: Description and baseline of the Environment in the project area

- Present the areas subject to the study and assessment (areas of influence of the project);
- Collect and analyze baseline data of environmental elements in the area of influence of the project. Environmental elements to be covered include but are not limited to, the following:
  - ✔ Physical elements: geology, topography, soils, climate, air quality, drainage patterns, surface water, groundwater, water quality, soil erosion, etc.
  - ✔ Biological elements: flora and fauna, habitats, rare and endangered species, protected areas and other areas classified as vulnerable, trends in fauna and flora, etc.
  - ✔ Socio-economic elements: demographic characteristics, population density, land- use, agricultural and economic activities, modes of transport, road networks and their usage, administrative structures, employment, presence and magnitude of waterborne diseases and HIV/AIDS, sites of natural or cultural value, etc.

Activity 3: Detailed assessment of the environmental and social impacts of the project

The EIA team will identify, analyze and assess environmental impacts of the proposed works. The study will investigate in detail the potential for the following impacts arising from the proposed works (not limited to these):

Direct impacts on the environment

- Direct impact on the environment and biodiversity (e.g. destruction or defragmentation of habitats, destruction or degradation of protected or vulnerable areas, ecosystems, species, poaching, [temporary] settlements, etc.)
- Direct impacts on surface water and catchment areas: water flow, erosion, water quality, etc.;
- Direct impacts on groundwater systems and quality, related to changes in surface water flows;
- Direct impact on landscape: topography, land use, erosion, drainage, quarries, camps, etc.;
- Direct impact on natural resources: project requirements in water, wood, energy, and other resources;
- Direct pollution from the project (routine, non-routine, accidental): solid waste, toxic and hazardous waste, effluents and discharges, leakages, spills, run-off, noise and air.
- Direct impact on natural disaster risks: landslides, flooding, erosion, etc. Indirect impacts on the **Environment**
  - ✔ Increase in deforestation (e.g. logging, land clearing, slash and burn, etc) ;
  - ✔ Increase and facilitation in forest resource exploitation (industrial and local);
  - ✔ Increase in poaching and harvesting of non-timber forest products;

Socio-economic impacts

- ✔ Impacts on health and security of the population (GBV, disease transmission, particularly HIV/AIDS and waterborne diseases, access to medical treatments, accident risk, noise and air pollution, etc.);
- ✔ Impacts on vulnerable groups
- ✔ Impacts on the local population, economic activities, creation of employment, loss of agricultural and residential lands, destruction of properties, relocation of infrastructures, threats to cultural and historical sites;

Characteristics of the impact assessment

Environmental impacts will be analyzed in terms of the following and any other relevant characteristics:

- ✔ Positive (beneficial); Negative (adverse)
- ✔ Direct, indirect, cumulative
- ✔ Magnitude
- ✔ Spatial coverage
- ✔ Stages of the project at which they occur
- ✔ Duration (intermittent, continuous, short-term, long-term)
- ✔ Reversibility, irreversibility

- Likelihood of occurrence

Wherever possible, the above and any other impact characteristics shall be analyzed quantitatively and the cost of each impact will be indicated. The significance of impact of the proposed works will be assessed, and the basis of this assessment specified. The EIA team will take into consideration any national and international environmental standards, legislation, treaties, and conventions that may affect the significance of identified impacts. The team will use the most up-to-date data and methods of analyzing and assessing environmental impacts (considering the local context). Uncertainties concerning any impacts will be indicated.

Activity 4: Environmental Management Plan, EMP

The EIA team will suggest cost-effective measures to minimize, mitigate, or eliminate adverse impacts of the proposed works. Measures to enhance beneficial impacts will also be recommended.

The Environmental Management Plan will include, but will not be limited to, the following:

- Mitigation measures for potential environmental and social impacts identified;
- Monitoring plan for the implementation of the mitigation measures;
- The estimated cost of implementation of the mitigation and monitoring measures;
- Institutional arrangements necessary for implementing the environmental management plan;
- Activities for strengthening of institutions, project staff and local population capacities;

In the context of the EMP, the EIA team will define the magnitude and level of responsibilities that are attributable to the project in the modification and impacts to the environment (in relation also to other initiatives and developments foreseen or ongoing). The EIA team will also take into consideration in its EMP, other mitigating initiatives, such as for instance the strengthening of forest governance. Finally, the EIA team will also present the EMP so that it enables the project to comply with conditions of project approval, ensures that mitigation measures are effective, and provide data that will be used during environmental audits.

Activity 5: GBV Action Plan:

The EIA team will suggest efficient measures to prevent and counter the occurrence of SGBV in the Project areas; and suggest methods to ensure equality in the project activities related to direct beneficiaries, in alignment with the GBV Action Plan. The GBV will include, but not be limited to, the following:

- GBV procedures,
- GBV-related training and monitoring activities (pre-deployment and during project implementation) – for communities and construction workers, aid workers going into communities, etc…

The duration of the appointment is of xxx the start date for the appointment is foreseen for xxxx.

The appointment will take place in the activity location, for all relevant and necessary field data collection, and home-based for all desk reviews, analyses, drafting and editing of reports.

IV. Expected results and outputs

Output

The EIA Team will produce a report which can be easily understood by the public. The report will include the following:

- Executive summary;
- Note on the methodology used throughout the study and assessment;
- Description of the context of the project including identification of the relevant laws and regulations (see activity 1);
- Description and baseline of the Environment in the project area (see activity 2);
- Detailed assessment of the environmental and social impacts of the project (see activity 3);
- Suggestions for the refinement of the ESMF for the mitigation of the environmental impacts of the project (see activity 4);
- Environmental Management Plan, including mitigation and monitoring(see activity 5) ;

- GBV and Gender Equality Action Plan (see activity 6).

Annexes will include: list of meetings and consultations, composition of the EIA team, and any other relevant information. All collected data will be presented in both hard copies and digital forms.

The draft reports, including in particular the detailed assessment of environmental and social impacts, and the management plans required, will be submitted to the IP 5 weeks into the appointment. Comments of project stakeholders, following consultations on the conclusions of the assessment and plans, will be provided to the EIA team 1 weeks after submission of the draft report. The final report, including all annexes and incorporating comments, will be available on xxx in digital format.

The report and annexes will be provided in English.

Expected impacts

- Positive contribution to the overall success of the EA-RDIP;
- Significant mitigation or elimination of adverse environmental and social impacts, due to the implementation of project activities;
- Effective ownership of mitigation and monitoring measures by project staff and concerned populations.

V. Profile of the team

Profile of the EIA team

- Minimum experience of five 5 years in Environmental Impact Assessments. Specific experience on EIA for community infrastructure and in Somaliland is an asset;
- Having successfully performed at least two (2) similar assessments of which one (1) financed by World Bank.
- Team composed of experts and staff with the following profiles (as a minimum):

Expert in Environmental Impact Assessments – team leader

PhD or Master's degree in environmental science, natural resource management or equivalent;
Fifteen (15) years of relevant professional experience:

- Experience as multi-disciplinary team leader for Environmental and Social Impact Assessments;
- Proven experience in biodiversity conservation and land use planning;
- Excellent knowledge of methodologies necessary of Environmental and Social Impact Assessment in the context of community infrastructure;
- Sound knowledge of environmental mitigation and monitoring plans
- Sound knowledge of legislation and donor policies that will affect the environmental management of the project;
- Experience in disaster-affected contexts is an asset;
- Fluency in English.

Expert in Social Science and Socio-economics

PhD or Master's Degree in social sciences or equivalent; ten (10) years of professional experience:

- Excellent analytical skills in analysis of social impacts in community infrastructure or related projects
- Experience in data collection and analysis, from secondary sources such as governmental statistics, sampling, etc.;
- Sound knowledge of legislation and donor policies that will affect social management of the project;
- Experience in Gender Equality and Women's Empowerment;
- Fluency in English.

Expert in Terrestrial Ecology or Biological Sciences

PhD or Master's Degree in Environmental Science, Biological Science, Ecology or equivalent; ten

- ✔ (10) years of professional experience:
- ✔ Proven experience in biodiversity conservation, management of natural resources, and/or management of protected areas;
- ✔ Experience on the assessment of terrestrial and aquatic ecosystems;
- ✔ Experience on the evaluation of environmental impacts of development projects.
- ✔ Sound knowledge of the environmental issues in community infrastructure-related issues;
- ✔ Knowledge of the procedures for EIA on protected or classified areas;
- ✔ Fluency in English

ANNEX 10
RESETTLEMENT ACTION PLAN OUTLINE (RAP)

The RAP report will contain the below listed contents

Introduction

- It briefly describes the project.
- Lists project components including associated facilities (if any).
- Describes project components requiring land acquisition and resettlement; give overall estimates of land acquisition and resettlement.

Minimizing Resettlement

- Describes efforts made to minimize displacement.
- Describes the results of these efforts.
- Describes mechanisms used to minimize displacement during implementation.

Census and Socio-economic Surveys

- Provides the results of the census, assets inventories, natural resource assessments, and socioeconomic surveys.
- Identifies all categories of impacts and people affected.
- Summarizes consultations on the results of the various surveys with affected people.
- Describes need for updates to census, assets inventories, resource assessments, and socio economic surveys, if necessary, as part of RAP monitoring and evaluation.

Legal Framework

- Describes all relevant local laws and customs that apply to resettlement.
- Identifies gaps between local laws and World Bank Group policies, and describe project-specific mechanisms to address conflicts.
- Describes entitlement policies for each category of impact and specify that resettlement implementation will be based on specific provisions of agreed RAP.
- Describes method of valuation used for affected structures, land, trees, and other assets.
- Prepares entitlement matrix.

Resettlement Sites

- Describes the specific process of involving affected populations in identifying potential housing sites, assessing advantages and disadvantages, and selecting sites.
- Describes the feasibility studies conducted to determine the suitability of the proposed sites, including natural resource assessments (soils and land use capability, vegetation and livestock carrying capacity, water resource surveys) and environmental and social impact assessments of the sites.
- Demonstrates that the land quality and area are adequate for allocation to all of the people eligible for allocation of agricultural land.
- Provides data on land quality and capability, productive potential, and quantity.
- Give calculations relating to site requirements and availability.
- Describes mechanisms for: 1) procuring, 2) developing and 3) allotting resettlement sites, including the awarding of title or use rights to allotted lands.
- Provides detailed description of the arrangements for site development for agriculture, including funding of development costs.
- Have the host communities been consulted about the RAP? Have they participated in the identification of likely impacts on their communities, appropriate mitigation measures, and preparation of the RAP?
- Do the host communities have a share of the resettlement benefits?

Income Restoration

- Describes if there are compensation entitlements sufficient to restore income streams for each category of impact?

- Describes additional economic rehabilitation measures are necessary?
- Briefly spell out the restoration strategies for each category of impact and describe their institutional, financial, and technical aspects.
- Describes the process of consultation with affected populations and their participation in finalizing strategies for income restoration.
- Explains if income restoration requires change in livelihoods, development of alternative farmlands or some other activities that require a substantial amount of training, time for preparation, and implementation?
- Describes how the risks of impoverishment are to be addressed?
- Describes the main institutional and other risks for the smooth implementation of the resettlement programs?
- Describes the process for monitoring the effectiveness of the income restoration measures.
- Describes any social or community development programs currently operating in or around the project area.
- If programs exist, do they meet the development priorities of their target communities? Are there opportunities for the project proponent to support new program or expand existing programs to meet the development priorities of communities in the project area?

Institutional Arrangements

- Describes the institution(s) responsible for delivery of each item/activity in the entitlement policy
- Describes the Implementation of income restoration programs; and coordination of the activities associated with and described in the resettlement action plan.
- States how coordination issues will be addressed in cases where resettlement is spread over a number of jurisdictions or where resettlement will be implemented in stages over a long period of time.
- Identifies the agency that will coordinate all implementing agencies. Does it have the necessary mandate and resources?
- Describes the external (non-project) institutions involved in the process of income restoration (land development, land allocation, credit, and training) and the mechanisms to ensure adequate performance of these institutions.
- Discusses institutional capacity for and commitment to resettlement.
- Describes mechanisms for ensuring independent monitoring, evaluation, and financial audit of the RAP and for ensuring that corrective measures are carried out in a timely manner.

Implementation Schedule

- Lists the chronological steps in implementation of the RAP, including identification of agencies responsible for each activity and with a brief explanation of each activity.
- Prepares a month-by-month implementation schedule of activities to be undertaken as part of resettlement implementation.
- Describes the linkage between resettlement implementation and initiation of civil works for each of the project components.

Participation and Consultation

- Describes the various stakeholders.
- Describes the process of promoting consultation/participation of affected populations and stakeholders in resettlement preparation and planning.
- Describes the process of involving affected populations and other stakeholders in implementation and monitoring.
- Describes the plan for disseminating RAP information to affected populations and stakeholders, including information about compensation for lost assets, eligibility for compensation, resettlement assistance, and grievance redress.

Grievance Redress

- Describes the step-by-step process for registering and addressing grievances and provide specific details regarding a cost-free process for registering complaints, response time, and communication methods.
- Describes the mechanism for appeal.

- Describes the provisions for approaching civil courts if other options fail.

Monitoring and Evaluation

- Describes the internal/performance monitoring process.
- Defines key monitoring indicators derived from baseline survey. Provide a list of monitoring indicators that will be used for internal monitoring.
- Describes institutional (including financial) arrangements.
- Describes frequency of reporting and content for internal monitoring.
- Describes process for integrating feedback from internal monitoring into implementation.
- Defines methodology for external monitoring.
- Defines key indicators for external monitoring.
- Describes frequency of reporting and content for external monitoring.
- Describes process for integrating feedback from external monitoring into implementation.
- Describes arrangements for final external evaluation.

Costs and Budgets

- Provides a clear statement of financial responsibility and authority.
- Lists the sources of funds for resettlement and describe the flow of funds.
- Ensures that the budget for resettlement is sufficient and included in the overall project budget.
- Identifies resettlement costs, if any, to be funded by the government and the mechanisms that will be established to ensure coordination of disbursements with the RAP and the project schedule.
- Prepares an estimated budget, by cost and by item, for all resettlement costs including planning and implementation, management and administration, monitoring and evaluation, and contingencies.
- Describes the specific mechanisms to adjust cost estimates and compensation payments for inflation and currency fluctuations.
- Describes the provisions to account for physical and price contingencies.
- Describes the financial arrangements for external monitoring and evaluation including the process for awarding and maintenance of contracts for the entire duration of resettlement.

Annexes

- Copies of census and survey instruments, interview formats, and any other research tools.
- Information on all public consultation including announcements and schedules of public meetings,
- Meeting minutes, and lists of attendees.

Required Personnel; Sociologist, Land Valuer **and** Land Surveyor

ANNEX 11

DETAILED ESHS TO INCLUDE IN THE SPECIFICATIONS OF TENDER DOCUMENTS AND SAMPLE ENVIRONMENT AND SOCIAL MANAGEMENT PLAN (ESMP)

1.	**Environmental policy**	➢ Declaration of ESHS policy signed by the managing director of the Contractor and clearly defining the commitment of the Contractor in terms of (i) ESHS management for its construction sites and (ii) compliance with the ESHS Specifications of the Contract.
2.	**Worksite-ESMP**	➢ Target and content of the contractors Environmental and Social Management Plan (C-ESMP) ➢ Preparation and updating schedule ➢ Quality assurance and validation
3.	**ESHS resources**	➢ Human resources: - ESHS Manager - ESHS Supervisors - Person in charge of relations with stakeholders - Medical personnel ➢ Logistics & communications: - ESHS vehicles - In situ noise, air and water measuring equipment ➢ Reporting: - Weekly inspections - Monthly - Accident / Incident
4.	**ESHS regulations**	➢ Definition of standards for the applicable national ESHS regulations applicable to the execution of works: - Discharge standards - Minimum wage - Day and/or night traffic restrictions ➢ Definition of ESHS standards for the industry applied
5.	**ESHS operational inspection resources**	➢ Site tracking procedure: - Frequency - Personnel - Assessment criteria ➢ Non-conformity handling and detection procedure: - Distribution information - Notification depending on the level of importance allocated to non-conformities

		- Tracking of the closing of the non-conformities ➢ Management of data on tracking and non-conformities: - Archiving - Use as a performance indicator
7.	**Health and Safety Plan**	Identification and characterization of health and safety risks, including the exposure of personnel to chemicals, ➢ Description of working methods to minimize hazards and control risks ➢ List of the types of work for which a work permit is required. ➢ Personal protection equipment. ➢ Evacuation procedure for medical emergencies. ➢ Description of the internal organisation and action to be taken in the event of an accident or incident.
8.	**Training plan**	➢ Basic training for non-qualified staff ➢ Health & safety training
9.	**Labor Conditions**	➢ Description of Human Resource Policy for construction works of direct and indirect workers
10.	**Local recruitment**	➢ Local labor requirements: - Job descriptions and the levels of qualifications required - Recruitment procedure and deployment schedule - Initial training to be provided by the Contractor for each job description ➢ Location and management of the local recruitment office(s)
11.	**Traffic Management Plan**	➢ Deployment (Project Area & schedule) and maintenance sites for each vehicle and machine ➢ Mapping of itineraries, travel times, and areas where speeds are limited ➢ Dust suppression: - Mapping or road sections where dust reduction initiatives apply - Water points identified or to be created for refueling tanker trucks - Capacity of the tanker trucks used and calculation of the number of trucks required - Width of the track to determine if one watering run or equivalent is adequate (narrow track) or if two runs are required (wide track) - Number of watering or equivalent operations proposed per day depending on the climate
12.	**Effluents**	➢ Characterization of effluents discharged to the receiving environment ➢ Facilities for the treatment or pre-treatment of effluents ➢ Measures for reducing the sediment content of rainwater runoff ➢ Measures for monitoring the efficiency and performance of facilities for reducing sediment content of rainwater runoff ➢ Resources and methods for monitoring effluent and rainwater runoff quality

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13.	**Noise and vibrations**	➢ Estimation of the frequencies, duration, days of the week and noise levels per Project Area
14.	**Waste**	➢ Inventory of waste per Project Area and per period ➢ Collection, intermediate storage, handling and treatment methods for ordinary or inert waste ➢ Storage and handling methods for hazardous waste
15.	**Clearing and re-vegetation**	➢ Methods & schedule for clearing vegetation ➢ Methods, species and schedule for the re-vegetation of Project Areas disturbed by the Works
16.	**Prevention of erosion**	➢ Location of zones suffering from erosion ➢ Methods and schedule for the implementation of anti-erosive actions, including topsoil storage
18.	**Documentation on the Project Area condition**	➢ List and cover of viewpoints ➢ Imaging method???? ➢ Archiving photographs
19.	**Rehabilitation**	➢ Method and schedule for Project Area rehabilitation

ANNEX 11
SAMPLE ENVIRONMENTAL POLICY

Xxxxx Company is committed to minimizing significant environmental impacts of our activities, processes and products. T**he following Environmental Policy Statement:**

- We are committed to comply with all the relevant Somaliland National legislations and regulations related to environment.
- Continual improvement in environmental performance incorporating sustainable measurement and monitoring mechanisms;
- We will ensure the responsible use of natural resources, especially energy, raw materials and water in an efficient manner
- We will implement construction mitigation measures, monitoring and audit programs as specified.
- We will minimize the release of any pollutant or effluent that may cause environmental damage to the air, water or soil.
- We will control pollution through adoption of innovative cleaner production technologies;
- We will use environmentally safe and sustainable energy sources to meet our needs, and invest in improved energy efficient technologies where available. Energy efficient management practices will be developed.
- We will minimize the environmental, health and safety risks to the employees and communities in which we operate by employing safe technologies and operating procedures, training the employees and by being constantly prepared for emergencies.
- We will commit management resources to implement this environmental policy; all employees will be made aware of their individual responsibilities for acting in accordance with the Program Environmental Policy.
- We will seek to be good neighbors, improve the aesthetic appearance of the site(s), develop a system for handling complaints, resolving and make great effort to provide an efficient and friendly channel of communication.
- We will conduct annual self-evaluation of our environmental performance and compliance with requirements.
- We will work towards the timely creation of independent annual environment audit procedures to which we will adhere to.

MANAGING DIRECTOR: ……
SIGNATURE: …….
STAMP: ……

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ANNEX 12
SAMPLE HEALTH AND SAFETY POLICY

Xxxxxx Company recognizes and adopts the Occupational Safety Health provisions at work place, all other applicable legislation and is therefore committed to ensuring the Health, Safety and Welfare of all employees and any others who could be affected by acts or omissions of **Xxxxxx Company**. Furthermore, **Xxxxxx Company** is committed to continuous improvement in respect of Health and Safety Performance and supporting Management Plan.

We will, so far as is reasonably practicable:

i. Provide adequate resources to maintain health and safety within the sub-project sites.
ii. Provide and maintain systems of work which are safe and without risk to workers and school community health.
iii. Establish arrangements for the use, handling, storage and transportation of articles and substances provided for use at work, which are safe and without risks to health.
iv. Provide employees with such information, instruction, training and supervision as is necessary to ensure their safety and health at work and that of others who may be affected by their activities.
v. Ensure that all machinery, plant and equipment are maintained in an efficient and safe working condition.
vi. Make adequate provision and arrangements for welfare facilities (sanitation facilities, water) at work.
vii. Keep the workplace safe and ensure that all access and egress points are safe and without risk.
viii. Monitor health and safety performance to maintain agreed standards.
ix. Maintain effective communication on the health and safety policy to employees and their representatives.
x. Provide information and assistance to public on community health and safety issues arising from our operations
xi. Review our health and safety objectives regularly for continual improvement

The duties of employees are to:

i. Take reasonable care of their own health and safety, and that of others who may be affected by their acts or omissions at work.
ii. Not interfere with, misuse or willfully damage anything provided in the company.
iii. Comply with the company's health and safety policy

MANAGING DIRECTOR: ……
SIGNATURE: …… .
STAMP: …….

ANNEX 13
GRIEVANCE REDRESS FORMS
Operating Procedures

The GRM is implemented as per the standard operational procedures summarized below in terms of detailed list allowable practices (DO's) and disallowed practices (DON'Ts). This will be provided to all EA_RDIP PIU and beneficiaries. Where need be, the SOPs will be translated into the respective VMGs languages. The SoPs are presented below.

GRM Standard Operating Procedures

Dos	Stage	Don't
• Build capacity for staff involved in the complaints handling process; • Establish multiple channels for communication and reporting; • Use user friendly channel; • Assign responsibility for uptake and response; • Create awareness on the GRM; • Encourage communication/ feedback from the public; • Spread uptake points across the project management levels and project operational areas • Acknowledge receipt for each complaint made • Encourage anonymous complaints	**Uptake**	• Create unnecessary restrictions, obstruct grievance process • Create scary conditions/environment for potential complainant • Use unfriendly language, tone, expression, cues, etc. • Forget to take measures to ensure that vulnerable groups are able to access GRM • Create barriers to complaining by making uptake processes time consuming or complicated • Charge complainants • Make judgements prematurely • Unduly focus on the identity and profiling of the complainant at the expense of issue submitted
• Indicate who is responsible for handling the different types of complaints, including reliable contacts and location; • Establish clear procedures for the grievance redress process • Assign each complaint a unique ID reference number	**Sort and Process**	• Develop a GRM that does not differentiate between different types of complaints • Leave any ambiguity about how complaints are supposed to be routed
• Inform users about steps in the complaints handling process • Stick to agreed schedules/guidelines for responding to users • Use simple and clear language	**acknowledge and follow-up**	• Divulge complainant's identity and profile to others • Treat GRM users as if their complaints is an inconvenience • Belittle, dismiss, and ignore complaints
• Objectively evaluate the complaints merits on the basis of facts • Ensure that investigators are neutral • Take action that is proportional to the comment or complaint • Strategically plan for the investigation	**Verify, Investigate and act**	• Appoint investigators that are biased • Breach confidentiality • Expect complainants to prove that they are right • Forget to update complainant on the status of their complain
• Build capacity for GRM - M&E • Indicate importance of grievances Establish a tracking system to record, classify, and assess grievances • Analyze grievance redress data and make improvements	**Monitor and evaluate**	• Miss the opportunity to integrate the GRM into the Project's Management Information System • View the resolution of complaints as an end in itself
• Provide timely feedback	**Provide feedback**	• Neglect to follow up with users • Keep complaint results as private matter

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• Contact users to explain how their grievances will be resolved and how/where they can appeal (if need be)		

Grievance Mechanism Forms

GRM_GRIEVANCE HANDLING REGISTER TEMPLATE

No.	Date Received	Name of Complainant/Rep	Complaint Issue	Complaint Channel	Date Acknowledged	Action Taken	Complaint Status

GRM_ACCESS TO INFORMATION REGISTER TEMPLATE

No.	Date Received	Name of Requester	Type of information Requested	Requisition Channel	Request Status

GRM_COMPLAINT INVESTIGATION TEMPLATE

No.	Nature of Complaint	Officer/Department complained Against	Cause of Complaint	Corrective/Preventive Action Taken

GRM_GRIEVANCE LODGING FORM

Ref. No. …….
SECTION A: Personal Information (*Provision of information in this section is voluntary)*

Complainant's Name: ……
ID Number: …….
Postal Address: ……..
Mobile No. ……..
Email (where applicable) ……..
Village/Ward/Sub-County: ……
Age: …….

SECTION B: Complaint Lodge

ITEM	DETAILS
Which public official/office are you complaining about?	
Name/Department/Sub-county/Ward/Agency	
Have you reported this matter to any other county official/office? YES/NO	
If YES, which one?	
Has this matter been the subject of court proceedings? YES/NO	
If NO, please give a brief summary of your complaint and attach all supporting documents (Indicate all the particulars of what happened, where it happened, when it happened and by whom)	
Action Taken	

_____ _____

_____

Place of Submission Signature of Complainant Date

GRM. ACCESS TO INFORMATION REQUEST FORM
Ref. No. …….

SECTION A: PERSONAL DETAILS

Name:…….. (Dr/Mr/Mrs /Ms)
ID Number:……..
Postal Address: …….
Mobile Phone No. ……
Email (where applicable): ……
Villag: ……
Age: ……
Gender: Male/Female / Other (specify): …….

SECTION B: DESCRIPTION OF INFORMATION REQUESTED

ITEM	DESCRIPTION
I would like to *(tick all that apply)*	*( )* Inspect the record *( )* Listen to the record *( )* Have a copy of the record availed to me
Delivery Method *(tick where applicable)*	*( )* Collection in person *( )* By email *( )* By mail
Does the information requested concern the life or liberty of any person?	*( )* No *( )* Yes *(explain)*
Is the request being made on behalf of another person or group of persons?	*( )* No *( )* Yes *(explain)* *( )* No *( )* Yes *(explain)*
Action taken	

_____ _____ _____

Place of Submission Signature of Complainant Date

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GRIEVANCE MANAGEMENT AND ACCESS TO INFORMATION INFRASTRUCTURE

No.	INDICATORS	DETAILS OF IMPLEMENTATION
1	Physical location: Provide the contact and physical address	Include the details of all GRM offices.
2	**a.** Provide names, contact details (Official telephone & e-mail address) and designation of officers in-charge of Grievance handling **b.** Provide names, contact details and designation of the Information access officers	Include details for all the GRM offices.
3	Communication channels: a. Complaint desk email(s) b. Dedicated telephone line(s) c. Official email address of the county d. County website (Links/portals to access information and grievance handling information e. Official e-mail address of the County Secretary	
4	Updated service delivery charters that include GRM	Include the service charters for all the departments and agencies
5	**a.** Complaints Register **b.** Access To Information Register	Include the registers of all GRM offices but for internal purposes only
6	GRM Policy and Procedures	
7	Legislation, Policy and Procedures	
8	a. Grievance Handling Committee members: appointment letters & minutes of meetings held b. Designation letters for all GRM & Information officers	

GRM_ M&E TOOL

Name of County: _____

OUTCOME: Services rendered by county government

INDICATOR: Percentage change in the complaints resolved in a year

No. of complaints received	Mode of complaint lodge	No. of complaints pending	No. of complaints resolved	Duration taken to resolve complaint	Recommendation for system improvement

_____ _____ _____

Compiled by Signature Date

_____ _____ _____

Approved by Signature Date

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GRM _ SUMMARY COMPLAINTS' REPORTING FORM

Name of County: _____

Reporting Period: Monthly/Quarterly/Annually _____

OUTCOME: Services rendered by county government improved ***INDICATOR: Percentage change in the complaints resolved in a year (to be reported once per year)***								
Sector	Administrative Unit	No. of Complaints Received	Resolved complaints		Pending complaints		Modes of complaint lodge	Average duration taken to resolve complaint
			No.	%	No.	%		

_____ _____ _____

Compiled by Signature Date

_____ _____ _____

Approved by Signature Date

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ANNEX 14
ESMF SECURITY CHECKLIST
EMSF Checklist

NAME OF IMPLEMENTING PARTNER: **DATE:** **NAME OF RESPONDENT:**				
NO	**CRITERIA**	**YES**	**NO**	**REMARK**
	General Security			
1	Does the IP conduct security risk assessments prior to all activity?			
2	Is there a continuous review process of the security risk assessments in place?			
3	Are all Security protocols linked to these risk assessments, i.e. does the level of risk identified directly impact on which security mitigation measures are employed?			
4	Does the IP have a clear, formal and transparent internal Security hierarchy with clearly denoted security responsibilities?			
5	Does the IP employ a full-time security professional to manage and mitigate risk for its personnel in Somaliland?			
6	Do IP staff responsible for security have the authority to take or demand corrective action?			
7	Is there an effective procedure to escalate or deescalate security IP posture?			
8	Does the IP maintain SOPs for the Security of personnel, property and infrastructure?			
9	Are all IP personnel aware of their responsibilities within these SOPs?			
10	Does the IP hold and maintain communication protocols, are these robust enough to ensure communication with all personnel during emergencies? i.e. can the IP reach all of its personnel all of the time?			
11	Does the IP hold and maintain movement protocols, are these implemented effectively and are they linked to Security Risk Assessments?			
12	Are IP staff who are responsible for security obliged to take action for all project missions?			
13	Does the IP maintain access mapping?			
14	Do clear lines of communication exist for project workers when organizing missions and understanding the required levels of security and mitigation measures?			
15	Are there internal processes in place to record, track, and monitor the ongoing missions and any action taken on them?			
16	Is there a templated and mandated security reporting framework?			
17	Are project personnel provided with pre-deployment briefings (security briefings), HEAT training, culture briefings, and training on the IP's security procedures?			
18	Are all workers (including from sub-contractors) inducted to internal safety and security policies?			

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19	Does the IP maintain and train it's personnel on in extremis 'Actions on'?			
20	Does the IP conduct regular security exercises, table top and physical, to test risk mitigation measures?			
21	Does a process for quality assurance and periodic evaluation of the internal security policies and procedures exist, that informs proactive actions for development?			
22	Does the IP have a quality assurance mechanism to qualify security contractor's performance?			
23	Do clear security service procurement guidelines exist?			
24	Is there a security component to the recruitment process, i.e. criminal background checks			
25	Does the IP have established community engagement protocols?			
26	Does the IP have Crisis response procedures (including Hostage incident management protocols)?			
27	Does the IP have effective Headcount procedures in place i.e. can it, at any time, accurately locate all its personnel?			
28	Does the IP hold and maintain effective Relocation and Evacuation procedures? and are these tested regularly?			
29	Are these Relocation and Evacuation procedures tested regularly?			
30	Does the workers' safety and security policies cover all types of workers?			
	Does the IP request every worker to sign a Code of Conduct with reference to internal safety and security policies?			
	Does the IP request every sub-contractor to request from its workers to sign a Code of Conduct with reference to internal safety and security policies?			
	Is the IP and its subcontractors able to furnish records of all mission information and project worker incidents, and provide them to the PIU?			

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