PUNTLAND STATE OF SOMALIA

Ministry of Agriculture and Irrigation

Environmental and Social Management Plan (ESMP)

Construction of Office Building for the Ministry of Agriculture and Irrigation (MoAI)

Submitted to:

State Project Coordinator

Somalia FSRP

Garowe Somalia

March, 2026

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List of Abbreviations and Acronyms

ABBREVIATION/ ACRONYMNS	FULL TERM
BOQ	Bill of Quantities
C-ESMP	Contractor's Environmental and Social Management Plan
E&S	Environmental and Social
EHSG	Environmental, Health, and Safety Guidelines
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FGS	Federal Government of Somalia
GBV	Gender-Based Violence
GM	Grievance Mechanism
LMP	Labor Management Procedures
MoAI	Ministry of Agriculture and Irrigation
NPCU	National Project Coordination Unit
SPCU	State Project Coordination Unit
OHS	Occupational Health and Safety
PAP	Project Affected Person
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
SEAH	Sexual Exploitation, Abuse, and Harassment
SEP	Stakeholder Engagement Plan
WB	World Bank
FMS	Federal Member State
WMP	Waste Management Plan

Executive Summary

The Somalia Food Systems Resilience Project (S-FSRP), financed by the World Bank and implemented by the Federal Government of Somalia and the Puntland State Government, aims to strengthen the resilience of Somalia's food systems to climate variability and shocks through climate-smart investments, improved natural resource management, and enhanced institutional capacity. As part of this effort, the Ministry of Agriculture and Irrigation (MoAI) is undertaking the construction of a new office building and supporting facilities within its headquarters compound in Garowe. This Environmental and Social Management Plan (ESMP) has been prepared in line with the World Bank Environmental and Social Framework (ESF), the S-FSRP Environmental and Social Management Framework (ESMF), and relevant environmental regulations of Somalia and Puntland.

Based on environmental and social screening conducted in accordance with the project ESMF, the subproject has been classified as a Moderate Environmental and Social Risk, and therefore requires preparation and implementation of a site-specific Environmental and Social Management Plan (ESMP).

The subproject will be implemented on government-owned land in Garowe and does not involve land acquisition, displacement, or demolition of existing structures. The planned works involve construction of a (G+1) office building with approximately 28 offices, meeting rooms, reception areas, a library, storage rooms, cafeteria facilities, and circulation areas to support administrative and technical functions of the Ministry. The project aims to provide improved working conditions for staff and strengthen institutional coordination for agricultural sector programs.

The project site is located within a government administrative zone characterized by semi-arid climatic conditions, limited vegetation, and relatively low surrounding population density. The compound currently consists of undeveloped open land with gravel and rocky soils typical of the Garowe area. The project is expected to generate several positive impacts including improved institutional coordination, enhanced service delivery for the agricultural sector, improved working conditions for staff, and temporary employment opportunities for local skilled and unskilled workers during the construction phase.

Both construction and operational phases present environmental and social risks that are predictable and manageable. Construction phase risks include dust emissions, noise and vibration from machinery, construction waste generation, vehicle movement hazards, occupational health and safety risks to workers, potential community safety risks due to construction activities, labor management issues including child or forced labor risks, and potential risks related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). Operational phase risks may include waste management challenges, fire and electrical hazards, water and energy consumption issues, and safety risks associated with building operation and maintenance. All identified risks are site-specific, temporary, and can be effectively managed through the mitigation measures outlined in this ESMP.

The ESMP provides detailed mitigation and monitoring measures including dust suppression through regular water spraying, noise management through scheduling of construction activities during daytime hours, proper segregation and disposal of construction waste, safe storage and handling of hazardous materials, and implementation of occupational health and safety procedures including provision of Personal Protective Equipment (PPE) and regular worker safety training. Additional measures include installation of construction site fencing and safety signage, traffic management measures to control vehicle movement, and SEA/SH prevention measures through worker Codes of Conduct, awareness training, and confidential reporting mechanisms.

Institutional responsibilities for ESMP implementation are clearly defined. The Ministry of Agriculture and Irrigation (MoAI) will provide overall oversight of the project and environmental and social safeguard compliance, while the State Project Coordination Unit (SPCU) will supervise ESMP implementation and monitoring. The contractor will prepare and implement a Contractor's Environmental and Social Management Plan (C-ESMP) prior to commencement of works and will ensure full compliance with mitigation measures.

The supervising engineer and SPCU Environmental and Social Specialists will conduct regular monitoring and reporting, while relevant government authorities will provide regulatory oversight where applicable.

A multi-channel Grievance Mechanism (GM) is in place under the S-FSRP project, allowing workers and project-affected stakeholders to submit complaints through designated focal points, complaint boxes, direct communication with project representatives, or electronic channels. All grievances will be recorded and addressed in a timely manner, while SEA/SH-related complaints will be handled through confidential, survivor-centered procedures consistent with World Bank requirements.

The ESMP also includes monitoring and reporting arrangements, capacity building activities for contractors and project staff, and an indicative budget for mitigation, monitoring, and grievance management activities. Implementation costs for environmental and social management measures will be incorporated into the contractor's Bill of Quantities (BoQ) to ensure adequate resources are allocated for compliance with environmental and social safeguard requirements.

Overall, the MoAI office construction subproject is considered environmentally and socially feasible. With effective implementation of the ESMP and adherence to national regulations, the World Bank Environmental and Social Framework, the project is expected to improve institutional capacity, strengthen environmental and social safeguards, enhance working conditions, and contribute to the broader resilience objectives of the Somalia Food Systems Resilience Project.

1. Introduction

The Federal Government of Somalia (FGS) under the Ministry of Agriculture and Irrigation has received financial support from the World Bank under the Somali Food Systems Resilience Project (S-FSRP3 P177816).

Interventions expand in all the five federal member states of Puntland, Galmudug, Southwest State Hirshabelle, and Jubaland with an objective to increase preparedness against food insecurity and improve the resilience of food systems in targeted project areas of Somalia. The project intends to benefit an estimated 350,000 small farmers, agro-pastoralists, and nomadic pastoralists, of which at least 30 percent will be female.

The project has six components:

Component 1: (Re-) Building Resilient Agricultural Production Capacity. This component is focused on strengthening the foundations of resilient agricultural production by building the capacity of Somalia's crop and livestock research institutions, its seed and breeding systems, and its extension and advisory services to better cater to small farmers on a large scale.

Component 1 has 3 subcomponents, namely:

- Subcomponent 1.1: Crop and Livestock Research, Extension, and Seed Systems
- Subcomponent 1.2: Community Engagement and Technology Transfer
- Subcomponent 1.3: Digital Agriculture Solutions and Data Systems (US$10m)

Component 2: Sustainable Development of Natural Resources for Resilient Agricultural Landscapes. This component will support the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes. This component aims to enhance water availability for crop and livestock value chains and support rangeland rejuvenation and management and has two subcomponents, namely:

- Subcomponent 2.1: Water Availability for Crops and Livestock
- Subcomponent 2.2: Rangeland Management

Component 3: Getting to Market. This component is about ´Getting to Market´. This component will strengthen the agricultural sector's market orientation, helping it cater for both domestic and regional markets with three subcomponents:

- Subcomponent 3.1: Farmer Producer Organizations and Agrifood Enterprises
- Subcomponent 3.2: Market Infrastructure and Enterprise Development
- Subcomponent 3.3: Formal Savings and Credit Schemes for Agricultural Producers // OR, if broader, Access to Finance

Component 4: Promotion of a Greater Focus on Food Systems Resilience in National and Regional Policymaking. This component will build food systems resilience at the national and regional levels by focusing on building the capacity of public institutions and identifying relevant policy reform opportunities.

It has two subcomponents:

- Subcomponent 4.1: Institutional Capacity Building and Agrifood Policy Assessments for the Crops Sector
- Subcomponent 4.2: Institutional Capacity Building and Agrifood Policy Assessments for the Livestock Sector

Component 5: Contingent Emergency Response Component. This component will finance eligible expenditures in the event of an emergency precipitated by a disaster. The activation of CERC will be by request of the government and will allow funds to be disbursed rapidly to reduce damage to productive infrastructure, ensure business continuity, and speed up recovery.

And lastly, Somalia FSRP has Component 6:

Component 6: Project Management. Project Management. This component will ensure the effective implementation and coordination of the project at all levels, and it has two subcomponents:

- Subcomponent 6.1: Project Coordination and Management
- Subcomponent 6.2: Monitoring and Evaluation

The Project is financing the construction of office building for the Ministry of Agriculture and Irrigation Offices in Garowe, Puntland.

2. Purpose of the ESMP

In line with the Project's overall Environmental and Social Management Framework (ESMF), the objective of this ESMP is to provide management actions to mitigate adverse site-specific risks and impacts in line with national frameworks and relevant WB Environmental and Social Standards (ESSs) included in the Environmental and Social Framework (ESF), and the world Bank Group's Environmental, Health and Safety Guidelines (EHSGs) as well as Good International Industry Practices (GIIP). The implementation of this sub-project will basically be based on World Bank's ESF and relevant provisions of the EHSGs, as being most stringent framework.

This ESMP also identifies potential environmental and social risks and impacts of the Subproject and details the mitigation, management, monitoring, capacity building, and reporting measures to be taken during the construction and operation phases. It serves as a practical tool for the Contractor and the supervising agency, the National Project Coordination Unit (NPCU) to guide the management of E&S issues. The plan is a live document and will be reviewed and updated as necessary throughout the Subproject lifecycle after the annual Environmental and Social Audits.

3. Methodology

The preparation of this ESMP was based on stakeholder consultations, field visits, and review of all projects related documentation, including design documents. The main reference documents included World Bank ESF and ESS good practice documents and guidelines, relevant national legislation, policies, and guidelines, international covenants and treaties, WB ESSs and their relevancy to the project, among others. Consultation with key stakeholders in the application and implementation of the ESMP for the Project was conducted on the 04th September 2025. The aim was to provide input to the ESMP broad content areas of E&S baseline information, social and environmental risks and how to mitigate it, and handling of project related grievances. The participants during the consultation were representatives of relevant organizations. The participants provided input and suggestions on improving the ESMP. The ESMP will be disclosed in country and will be implemented throughout the construction period.

4. Sub-project Description

This ESMP is prepared for the construction of a new office building to serve as the main offices for the Ministry of Agriculture and Irrigation (MoAI) of the Puntland State of Somalia, accommodating staff, hosting official meetings, and facilitating the coordination of agricultural programs and services across Somalia.

The new building will provide a modern and functional working space for the Ministry's staff, enabling them to effectively carry out their duties, improve coordination, and deliver services that support the agricultural sector across Somalia. Understanding this operational purpose is essential for analyzing the potential environmental and social impacts during the building's use phase. The construction site is georeferenced as follows, Official Confirmation of Land Ownership and Jurisdiction: Ministry of Agriculture and Irrigation (MoAI) Puntland Property at Wadajir,70109 Garowe, Puntland, Somalia (GPS: 8.411354°N, 48.477331°E)

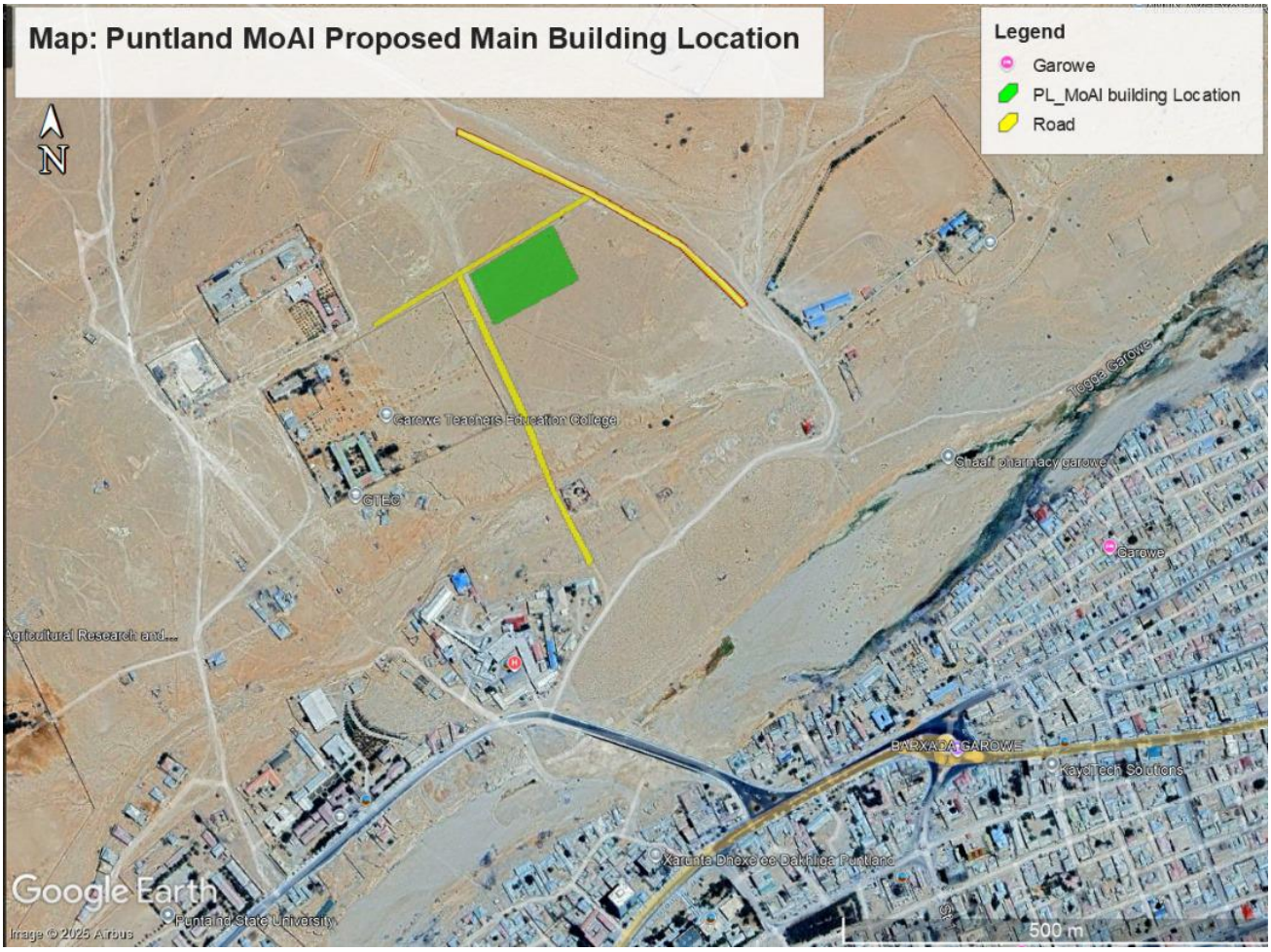


Figure 1: Google Earth Map Indicating the Location of the MoAI in Garowe

See property ownership certificate, D.M. 02 J
uly 2025, No. 31, ministry-owned land for purposes , in annex 2.

4.1 Project Rationale and Justification

The Ministry of Agriculture and Irrigation currently operates with limited office capacity, with part of the Ministry operations, including the Somalia Food Systems Resilience Project (S-FSRP) team, operating from rented premises. The construction of a new office building within the Ministry's compound will centralize ministry departments and project teams in one location, thereby improving institutional coordination, administrative efficiency, and service delivery to the agricultural sector.

The proposed building will enable the MoAI technical directorates and the S-FSRP implementation team to work within the same facility, improving coordination of agricultural development programs, planning, monitoring, and reporting activities. The facility will support day-to-day ministry functions including administration, meetings, coordination with stakeholders, and delivery of public agricultural services.

4.2 Location and Existing Site Conditions

The project site is located at coordinates 8.411354°N, 48.477331°E, within the Ministry of Agriculture and Irrigation compound in Garowe District.

The MoAI compound measures approximately 70 meters by 120 meters (about 8,400 m²). The proposed building will occupy a portion of this land within the compound. The project site is currently vacant land with no existing structures or vegetation. The terrain is slightly sloped and consists mainly of gravel and rocky soil conditions typical of the Garowe area. There are no trees or sensitive ecological features within the project site. The land is already disturbed and does not contain protected habitats, water bodies, or biodiversity areas.

4.3 Project Footprint and Architectural Layout

The proposed office building will have an approximate footprint of 50 m × 20 m (about 1,000 m²). As a Ground + 1 structure, the total floor area will be approximately 2,000 m².

The building layout includes approximately 28 offices, meeting rooms, reception areas, library space, storage rooms, a cafeteria, prayer room, and circulation corridors designed to support daily administrative operations of the ministry. Detailed architectural drawings and layout plans are provided in Annex 1.

4.4 Project Components and Construction Activities

The project involves the construction of a new two-story (Ground Floor + 1 Upper Floor) reinforced concrete frame building, Cafeteria, Prayer room, storage and external works. Based on the Bill of Quantities (BOQ), key activities include (BoQ, Designs, etc), see Annex 1 for design layout:

- **Substructure:** Site clearance, (Since the project site is already pre-disturbed, only minimal vegetation clearing will be required, and this will not involve the removal of bushes or shrubs), ground leveling of the ground on hilly sections, excavation for foundations, hardcore filling, removal of excess soil, and construction of reinforced concrete foundations and a retaining wall.
- **Superstructure:** Construction of reinforced concrete columns, beams, and slabs for the ground, first, and second floors.
- **Walling & Finishes:** Infilling with smooth-dressed hollow blocks, internal and external plastering, painting, floor and wall tiling.
- **Installations:** Installation of PVC windows, semi-solid core wood doors, and complete sanitary fittings (WCs, washbasins, etc.) for all floors.

- **Services:** Prime cost sums are allocated for Electrical Installation, Plumbing and Drainage Installation, and Decoration.

4.5 Construction Methodology

Construction activities will follow a conventional building construction sequence typically applied for reinforced concrete structures. The works will commence with site preparation, including clearing of the construction area and minor leveling to establish a suitable working platform. This will be followed by excavation works for the building foundations, after which reinforced concrete foundations will be constructed to support the structural load of the building.

Upon completion of the foundation works, the structural frame of the building will be erected, including reinforced concrete columns, beams, and slabs forming the Ground + 1 structure. Block masonry walls will then be constructed to form the building partitions and external walls. Roofing works will subsequently be completed, followed by installation of mechanical, electrical, and plumbing systems required for the operation of the facility. The final stage of construction will include internal and external finishing works such as plastering, painting, tiling, installation of fixtures and fittings, as well as minor landscaping and site cleanup prior to commissioning of the building.

4.6 Construction Schedule and Workforce

The construction of the MoAI office building is expected to be completed within approximately **12 months**, in accordance with the approved construction program and technical specifications. The schedule will be implemented under the supervision of the Ministry of Agriculture and Irrigation and the State Project Coordination Unit (SPCU) to ensure quality control and compliance with environmental and social safeguards.

The project will employ both skilled and unskilled labor sourced locally where possible. Skilled workers will include masons, carpenters, steel fixers, plumbers, and electrical technicians, while unskilled workers will support general construction activities. In addition, qualified engineers, supervisors, and environmental and social specialists will be engaged to ensure compliance with technical and safeguard requirements throughout the construction period.

Working hours will follow the standard labor practice in Somalia, typically eight hours per day from 8:00 a.m. to 5:00 p.m**.**, with scheduled breaks included. Construction activities will be limited to daytime hours to minimize disturbance and ensure safe working conditions.

4.7 Construction Support Facilities, Utilities and Site Logistics

During the construction period, the contractor will establish temporary facilities within the project site to support construction activities. These will include a contractor site office, workers' rest areas, temporary sanitation facilities such as portable toilets, and designated areas for storage of construction materials and equipment. These temporary facilities will be installed within the construction area and will be dismantled and removed upon completion of the works.

Water required for construction activities will be supplied through water trucks and temporary storage tanks, with possible connection to the nearby municipal water supply where available. Electricity required for construction operations will be provided through portable generators and temporary connections to the nearby electricity grid.

Construction materials will primarily be sourced from suppliers within Garowe and transported to the site using trucks. Material deliveries are expected to involve approximately 3–8 truck movements per day,

depending on the stage of construction. The project site is located within a government compound with controlled access through a single gate, which minimizes traffic risks to the surrounding community. Delivery of materials will be scheduled appropriately to ensure safe movement of vehicles within the compound and to avoid unnecessary congestion.

4.8 Environmental and Social Management and Safety

Construction activities will generate typical construction waste streams including excavated soil, concrete debris, packaging materials, scrap metal, and domestic waste from workers. Excavated soil will be reused within the site where feasible for leveling and backfilling activities. Any remaining construction waste will be collected, transported, and disposed of in accordance with the Contractor's Waste Management Plan (WMP) and in coordination with the designated disposal sites approved by the Garowe Municipality.

To ensure effective environmental and social risk management during project implementation, the contractor will prepare and implement several safeguard instruments prior to commencement of works. These include the Contractor's Environmental and Social Management Plan (C-ESMP), Occupational Health and Safety Plan (OHS), Labor Management Procedures (LMP), Waste Management Plan (WMP), Traffic Management Plan (TMP), Security Management Plan (SMP), and Emergency Preparedness and Response Plan (EPRP). These instruments will guide the management of environmental, social, occupational health and safety risks associated with construction activities.

Construction activities will take place on open land owned by the Ministry of Agriculture and Irrigation. The construction site will be secured with temporary fencing and clear warning signage to restrict unauthorized access during the construction period. As the site is located in an open area, direct interaction with ministry staff and the public is expected to be minimal. Nevertheless, appropriate safety measures will be implemented to ensure safe separation between construction activities and surrounding areas, including controlled site access, installation of safety signage, and periodic monitoring of site safety conditions throughout the construction period.

5. Environmental and Social Baseline Description

5.1 Environmental Baseline

The Subproject is situated in a built-up, urban environment within an existing Ministry of Agriculture and Irrigation compound in Garowe.

- **Living Environment (Flora & Fauna):** The site is pre-disturbed with minimal vegetation, described as "no bushes and shrub." There are no protected areas, critical habitats, or known endangered species on or near the site. Only minor occurrences of common urban fauna, such as birds, and insects, may be observed, but these are minimal ecological concern. The contractor will be required to conduct a pre-construction walkover to confirm the absence of any sensitive ecological features. However, if any fauna of ecological importance or protected species is unexpectedly observed during construction (chance findings), work in the immediate area will be halted, the relevant environmental authority will be informed, and appropriate mitigation measures will be implemented to ensure their protection.
- **Non-Living Environment:** Firstly, the project site is located in an urban area that is not naturally prone to significant soil erosion. Nonetheless, construction activities, particularly excavation for foundations, may temporarily disturb the soil and create localized erosion risks. To mitigate this, the contractor will apply standard control measures, including soil compaction, temporary cover, and proper site drainage management. Garowe's climate is hot and semi-arid, with year-round high temperatures averaging between 25°C and 35°C. Rainfall is seasonal, occurring mainly during the "Gu" rains (April–June) and the shorter "Deyr" rains (October–December), while the remaining months are largely dry.
- Secondly, the primary environmental concerns related to the project are air quality (dust from construction) and noise. The Subproject is located in a densely populated urban district where baseline air quality and noise levels are already influenced by traffic and other city activities. During the 12 -month construction phase, temporary impacts are expected, including dust from site clearance, excavation, vehicle movement, and material stockpiling, as well as gaseous emissions (SOx, NOx) from machinery and generators. Noise and vibration will also increase due to heavy equipment operations such as excavators and trucks, which will be required primarily during the initial stages of construction. These impacts are short-term and will be managed through C-ESMP measures, including regular water spraying for dust suppression, covering stockpiles, maintaining equipment to minimize emissions, and restricting noisy activities to standard daytime working hours. Finally, the Subproject is not located in a flood-prone area, and there are no surface water bodies that could be impacted.
- **Topography**: The project site is characterized by relatively flat to gently sloping terrain typical of Garowe's urban environment. Minor leveling activities may be required during site preparation.
- **Soil and Geotechnical Conditions**: The soil profile of the site consists mainly of gravelly and rocky soils typical of the Garowe area, which generally provide stable ground conditions for building foundations.
- **Hydrology and Drainage:** The project site is not located near any rivers, streams, or natural drainage channels. Surface runoff during seasonal rainfall is limited and naturally drains through surrounding urban drainage patterns.
- **Groundwater**: No shallow groundwater sources are known to exist directly beneath the project site that could be affected by the construction activities.
- **Air Quality Baseline**: Baseline air quality in Garowe is influenced primarily by urban dust, road traffic, and emissions from diesel-powered generators commonly used throughout the city.
- **Noise Baseline:** Existing noise levels in the project area are mainly associated with normal urban activities such as traffic movement and commercial activities.

- **Climate Change Factors:** Garowe experiences a semi-arid climate characterized by high temperatures, low rainfall, and periodic drought conditions, which influence environmental conditions in the region.
- **Vibration Sensitivity:** There are no known vibration-sensitive facilities such as hospitals, laboratories, or historical structures located immediately adjacent to the project site.
- **Existing Hazardous Materials:** No hazardous materials or contaminated land were identified on the project site during the preliminary site inspection.
- **Utility Infrastructure:** The surrounding urban area is served by electricity distribution networks and municipal water supply systems operated by local utility providers.
- **Traffic and Access Baseline:** The project site is accessible through existing urban roads in Garowe that support moderate traffic movement associated with government offices and residential areas.
- **Visual and Aesthetic Baseline:** The site currently consists of undeveloped open land within an urban government area, and the proposed building is expected to improve the visual appearance and functionality of the ministry property.

5.2 Social Baseline

- **Socio-economic Context:** Garowe's socio-economic landscape features significant income disparities, with remittances from the diaspora and a growing service sector playing crucial roles in the economy, while recurrent droughts and poverty, especially among Internally Displaced Persons (IDPs) and host communities, present ongoing challenges. Despite increasing real estate development and a formalizing planning process, there's a critical need for policies that foster economic empowerment, skills development, and integrate IDPs and vulnerable groups to promote self-sufficiency and social cohesion.
- **Livelihood:** Livelihoods in Garowe rely on a mix of livestock farming, which forms the economic backbone, and commerce and trade centered around the city's role as a business and transit hub for both local and imported goods. Women are particularly active in small-scale trading and household income generation, while men focus on higher-value trades and services. The economy also includes small-scale enterprises like vehicle repair, blacksmithing, and construction, and is supported by the constant flow of remittances from abroad.
- **Administration and Governance:** Garowe, the capital of Puntland, is administered by its municipal government and the Puntland State government, which is responsible for the region's regional parliament, presidential palace, and government ministries. Local administration focuses on service delivery in health, education, and water, with efforts to modernize property tax systems. However, challenges like corruption, lack of transparency, and limited public awareness hinder effective tax collection and overall governance.
- **Gender-based Violence (GBV):** Somalia is a patriarchal society with firmly entrenched gender roles that often subjugate women and girls. GBV is pervasive, particularly female genital mutilation/cutting (FGM/C), early marriage and psychological abuse. GBV is not rampant in Garowe as the administration had tried up to establish mechanism to deal with such though still some cases exist within the local setting and the IDPs and resettlement settings.
- **Local community composition:** the primary composition of Garowe's community consists of Somalis from various Darod clans, with significant populations of the Majerteen, Leelkase, Dhulbahante, Mehri, and Awrtable clans, along with a Madhibaan population. A significant and growing portion of the population is also composed of internally displaced persons (IDPs) from other parts of Somalia, now making up about a third of the urban population. This displaced population, along with other

residents, faces challenges such as limited social and economic interaction, poverty, food insecurity, and a lack of opportunities.

Minority/vulnerable groups: In Garowe, vulnerable groups include Internally Displaced Persons (IDPs) fleeing conflict and drought, low-status occupational minorities like the Madhiban, Tumal, and Bajuni who face historical discrimination, and other vulnerable populations such as street children, women, and people with disabilities. These groups experience challenges in accessing basic services like housing, water, and healthcare, are often excluded from political and economic life, and face heightened risks of physical and sexual violence, mental health issues, and social isolation.

- **Access to Water and Electricity:** Access to water and electricity in Garowe is characterized by significant challenges, including limited and costly water supplies, and high electricity prices due to reliance on diesel-powered grids. However, efforts are underway to improve these services, with projects like a wind and solar power station operated by NECSOM serving some of the population and initiatives focused on rainwater harvesting and sustainable water management to address scarcity in the wider Puntland region.

  Waste Management: Solid waste management in Garowe is a challenge. Garowe produces a considerable amount of waste every day, and in many areas, waste is dumped in open spaces, leading to contamination of soil, water, and air, which can cause infections, skin diseases, and respiratory illnesses.

  In Garowe, although the Municipality regulates waste collection, there are no well-developed municipal dumpsites for construction waste within the city limits. The contractor will therefore be required to use the designated dumpsite specified by the Garowe Municipality for all construction waste disposal. Daryeel Deegaan Company LTD (DDC), a licensed waste management service provider headquartered in Garowe, offers solid waste collection, transportation, and disposal services in coordination with the Municipality. The contractor is encouraged to collaborate with DDC to ensure proper handling and environmentally sound disposal of all construction waste generated during the project.

- **Cultural Heritage:** There are no known sites of cultural or archaeological significance within the Subproject area. A "chance finds" procedure will be included in the contractor's ESMP.

- **Security:** Security in Garowe is managed by Puntland security forces who conduct operations to combat threats and ensure public safety, while international and private security companies offer a range of services from crisis management to aviation and maritime security.

- The overall security situation in Garowe demands careful management. While the subproject's location within a secured government compound reduces some risks, the contractor will remain fully responsible for securing the immediate construction site, workers, and materials, and for coordinating closely with local security forces.

- **Surrounding Population:** The project site is located within Garowe's administrative and government district where surrounding land uses include government institutions only.

- **Impacts on Existing MoAI Staff:** Construction activities are not expected to significantly disrupt existing ministry operations since the building will be developed on designated ministry land.

- **Labor Influx Dynamics:** Most construction workers are expected to be recruited locally from Garowe and surrounding communities, which minimizes risks associated with labor influx.

- **Community Health Baseline:** Garowe is served by public and private health facilities that provide healthcare services to the local population and surrounding communities.

- **Road Safety and Pedestrian Movement:** Roads near the project site mainly serve access to government offices and experience relatively low traffic volumes. Pedestrian movement in the area is limited because the site is located within a government administrative zone with few surrounding institutions
- **Gender Dynamics**: Women in Garowe participate in economic activities such as small-scale trade and service provision. Due to the administrative nature of the project location and the limited surrounding population, the project is not expected to create significant gender-specific impacts. However, the project will promote equal employment opportunities and a safe working environment during construction
- **Existing Grievance Pathways**: The S-FSRP project has established a Grievance Mechanism (GM) through which stakeholders can submit complaints or concerns related to project activities.
- **Cultural and Social Norms:** Social relations in Garowe are influenced by clan structures, Islamic cultural values, and traditional community leadership systems.
- **Security System Description:** Security in Garowe is maintained by Puntland state security forces and coordinated security arrangements around government facilities.
- **Labor Market and Wage Context:** The construction sector in Garowe relies mainly on locally available skilled and unskilled labor engaged through daily or short-term contracts.
- **Social Infrastructure:** Garowe hosts key social infrastructure including schools, mosques, markets, health facilities, and administrative institutions that serve the surrounding communities.

6. Legal and Regulatory Framework

This chapter focuses on the relevant provisions of key Somalia policy, legal, regulatory and institutional framework, which are related to the activities to be carried out under this project. This chapter also includes other ESF provisions as required by the World Bank and associated Environmental Health and Safety Guidelines (EHSGs) and Good International Industrial Practice (GIIP) to which the borrower is obliged to adhere. It also presents an analysis of gaps between both national and WB's provisions. Additionally, this chapter presents relevant international conventions and treaties, which the FGS has signed or ratified. The Subproject will be implemented in accordance with the national laws of Somalia and the environmental and social Framework and applicable standards of the World Bank.

6.1 The National Framework

All activities will comply with the relevant laws and regulations of the Federal Government of Somalia, & Puntland State of Somalia including the constitution and all relevant legislations.

6.1.1: The provisional Constitution of Somalia:

Article 10 – Human Dignity: Human dignity is the basis for all human rights. It is inviolable and must be protected by all. The State power must not be exercised in a manner that violates human dignity.

Article 11 – Equality: All citizens, regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect shall have equal rights and duties before the law. The State must not discriminate against any person on the basis of age, race, color, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth. Thus, all laws, or political and administrative actions that are designed to achieve full equality for individuals or groups who are disadvantaged, or have suffered from discrimination in the past, shall be deemed to be not discriminatory.

Article 24 – Labor Relations: Every person has the right to fair labor relations. All workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the workplace. And, every labor law and practice shall comply with gender equality in the workplace.

Article 31 – Language and Culture: The state shall promote the positive traditions and cultural practices, whilst striving to eliminate customs and emerging practices, which negatively impact the unity, civilization and wellbeing of the Somali society. And the state shall promote the cultural practices and local dialects of minorities.

Article 32 – Right of Access to Information: Every person has the right of access to information held by the state, and the right of access to any information that is held by another person which is required for the exercise or protection of any other just right.

Article 27 (1 & 5) Economic and social rights- right to clean portable water. Women, aged and disabled and minorities who have suffered discrimination to be supported to realize their full potential.

Article 43 Land: land is recognized as primary resource and the basis of the people's livelihood; b) land shall be held, used and managed in an equitable, efficient, productive and sustainable manner; c) the FGS shall develop a national land policy, which shall be subject to constant review, d) no permit may be granted regarding the permanent use of any portion of the land, sea or air of the territory of the Federal Republic of Somalia, e) the FGS, in consultation with the FMS and other stakeholders, shall regulate land policy, and land control and use measures.

Article 111J – The Office of the Ombudsman: The office is protected against interference from any other person or entity. As such, independence, integrity and effective service delivery are also maintained. The Ombudsman shall: (i) Investigate complaints against government workers regarding: allegations/ outright violations concerning basic rights and freedom, abuse of power, unfair behavior, mercilessness, lack of

clemency, indiscipline or disrespect, corruptive act, illegal behavior, or those that could lead to mischief or injustice; (ii) Investigate complaints in relation to the activities of the Public Service Commission and other administrative institutions of the government, including defense and police forces that could lead to unequal services, unfair recruitment, or administration; (iii) Take appropriate steps to rectify or change items mentioned in earlier clauses through a fair, and appropriate process of consultations and sacrifices among the people concerned; (iv) Report on the complaints and issues raised and submit to the head of the offender; (v) Forward cases to the Attorney General and bring them before a court, as appropriate.

Article 111H – National Security Commission: A National Security Commission shall be established to study and develop an integrated security framework to address present and future needs of Somalia. It shall present proposals to ensure that human security is prioritized and incorporated into such a framework, through which the public may provide oversight and monitor security related expenditure and seek redress from abuses by security personnel.

Article 45 (—Environment‖) 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. The FGS and the governments of the FMS affected by environmental damage shall take urgent measures to clean up hazardous waste dumped on the land or in the waters of the FGS; take necessary measures to reverse desertification, deforestation and environmental degradation, and to conserve the environment and prevent activities that damage the natural resources and the environment of the nation, among other measures.

Article 115 (—Civil service‖) outlines civil service values and protection of their rights Constitution:

6.1.2: Relevant National legislation:

Environmental Protection and Management Act (April 2024), National Health Professionals Council Act (LR. 31/2020) and Law No. 9 of 26 January 1989; Draft National Environmental and Social Impact Assessment Regulations; Draft National Ozone Layer Protection Regulation; Draft National Forest Management Policy; and Draft National Charcoal Policy. All of these have some relevance, in one way or another, with the FSRP Project. —— as well as the Construction Permits Act (2022).

Environmental Protection and Management Act, 2024: The act guarantees the right to a clean, safe and healthy environment, provides requirements for waste management including hazardous wastes. The act requires the application of the polluter pay and precautionary principle in environment management. The construction project is required to adhere to all the relevant requirements prescribed by the act.

Environmental and Social Impact Assessment and Audit Regulations (ESIA) 2024: Part III, regulations 13, 16 and 17, guides public participation, collection and incorporation of views from the general public.

The Somali Labour Code (Law No. 36 of 2024), the Public Health legislation, Somalia National Gender Policy (2016) includes strategies to eradicate harmful traditional practices such as female genital mutilation/cutting (FGM/C) and child marriage and to improve services for the management of GBV/SEAH cases.

6.2 The World Bank Framework

As the Subproject is classified as having a "Moderate" environmental and social risk, a full Environmental Impact Assessment (EIA) is not required. This site-specific **Environmental and Social Management Plan (ESMP)** will serve as the primary instrument for identifying, assessing, and managing all potential risks and impacts.

In the absence of specific Somali national standards for air quality, water quality, or noise, or where such standards are less stringent, the project will adhere to internationally recognized benchmarks, including the WB ESF, **World Bank Group's General EHS Guidelines** and, where applicable, **World Health Organization (WHO)** standards. These standards will guide all management and monitoring activities throughout the project lifecycle.

World Bank Environmental and Social Framework (ESF): The following Environmental and Social Standards (ESSs) are relevant to this project (see Annex 4 for key descriptions):

- **ESS1:** Assessment and Management of Environmental and Social Risks and Impacts
- **ESS2:** Labor and Working Conditions
- **ESS3:** Resource Efficiency and Pollution Prevention and Management
- **ESS4:** Community Health and Safety
- **ESS5:** Land Acquisition, Restrictions on land use, and involuntary Resettlement
- **ESS6: Biodiversity conservation and sustainable mgt of living natural resources**
- **ESS8:** Cultural Heritage
- **ESS10:** Stakeholder Engagement and Information Disclosure

World Bank Group EHS Guidelines: The project will adhere to the WBG's General Environmental, Health, and Safety (EHS) Guidelines (EHSGs). The Subproject's commitment to adhering to the World Bank Group's General Environmental, Health, and Safety (EHS) Guidelines is a cornerstone of its risk management strategy. These guidelines are technical reference documents that define **Good International Industry Practice (GIIP)** for managing EHS issues in a sustainable manner. For this civil works project, they are critically important as they provide a practical and authoritative framework for implementing effective mitigation measures related to **Occupational Health and Safety** (e.g., use of PPE, site safety protocols), **Community Health and Safety** (e.g., site security, traffic management), and **Environmental Pollution Control** (e.g., managing dust, noise, and waste) during construction and operation. Their application ensures the Subproject is implemented to a high standard of safety and environmental stewardship in cases where Somali regulations and World Bank policies differ, the World Bank Standards will prevail and will be applied. This ESMP, along with the associated plans, S-FSRP Frameworks, and Manuals (ESMF, RPF, IPMP, LMP, WMP, GM, SEP, etc.), is legally binding on the contractor. The Contractor is required to prepare their C-ESMP upon signing the work contract and before commencing work. This preparation is based on the proposed management framework of this document (ESMP), the World Bank Environmental and Social Framework (ESF), and the Good International Industry Practice (GIIP) included in the EHSGs.

Detailed gap analysis has been developed with the project approved ESMF, refer to the following link: https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099101123104521377/p1778160d5cf1003093810fb7fa9629a42?utm_source=chatgpt.com

7. Environmental and Social Risks and Impacts – Overview

7.1 The Subproject's Positive Impacts

The Agricultural sector has seen recent vulnerability due to recurrent natural and man-made disasters, including fluctuating levels of conflict, poverty, economic crunch, political uncertainties, drought, floods and epidemics. The construction of ministry of Agriculture shall provide conducive environment and space to plan organize and develop policies to help address the challenges facing the Agricultural sector in Somalia.

In addition, the construction of the MoAI office building will generate several direct positive impacts. During the construction phase, the project will create temporary employment opportunities for skilled and unskilled workers, particularly from the local community. The procurement of construction materials and services from local suppliers will also support small businesses and contribute to the local economy. Once completed, the building will provide improved working conditions for ministry staff, enhance institutional coordination, and strengthen the capacity of the Ministry of Agriculture and Irrigation to effectively plan, implement, and monitor agricultural development programs and services.

7.2 The Expected Negative E&S Risks and Impacts

Based on the site visits conducted by E&S specialists, the stakeholder consultation meetings (01.09 – 04.09.2025), as well as referring to the applicable ESSs of the World Bank's ESF and parent ESMF of the S-FSRP, the following site-specific E&S risks and impacts have been identified for the new construction subproject of MoAI offices.

Table 1: Environmental and Social Risks and Impacts during construction and operation phases – overview

Risk Category	Key Risks and Impacts	Risk Rating
ESS 1: E&S Assessment and Management	- Inadequate implementation or monitoring of the ESMP, leading to unmitigated impacts. Proper and adequate screening of vulnerable and minority groups	- Moderate during construction - Minor during operation
ESS 2: Labor and Working Conditions	- A wide variety of OHS hazards for workers (Over-exertion, Work in heights, struck by objects, Exposure to dust, chemicals, hazardous or flammable materials, falling objects, different injuries, electrocution, slips and falls, Confined spaces and excavations) during demolition and construction activities; - Potential non-compliance with labor laws (child/forced labor); - Labour disputes over terms and conditions, including wages, working hours, payment delays, health and safety concerns in the work environment and working conditions; - Violation of the signed code of conduct for workers, including Gender-based Violence (GBV)/Sexual Exploitation Abuse and/or Sexual Harassment (SEA/SH); - Discrimination in workplace, including unequal inclusion opportunities for women, and minority groups in the intended activities, which could extend to the operation phase; - Lack of a functional worker' grievance mechanism.	- Moderate during construction - Minor during operation

Risk Category	Key Risks and Impacts	Risk Rating
ESS 3: Resource Efficiency & Pollution Prevention	- Intensive use of water and energy resources; - Air pollution (dust, vehicle emissions); noise and vibration from machinery; - soil/water contamination from improper management of waste/hazardous material storage and disposal, including construction waste. - Lack of a functional GM	- Moderate during construction - Moderate during operation
ESS 4: Community Health and Safety	- Safety hazards for MoAI staff/visitors from construction activities and debris; risk of spread of communicable diseases from the workforce. - Potential risks of intimidation, abuse, or conflict between security personnel and community members, especially at project sites. - Traffic and road safety hazards due to transporting staff, material, equipment, and waste from/to the worksite. - Lack of preparedness for emergencies (e.g., fire, accidents) could lead to harm to local communities - Gender based violence within the community brought by workers. - Security risks on the assets, people and against the community around the construction site.	- Moderate during construction - Moderate during operation
ESS5:	Risk of construction being on land not exclusively owned by the ministry, inadequate land ownership documentation, etc	Minor during construction
ESS6:	The project site is semi-arid open land with rocky soil and no vegetation or fauna observed; therefore biodiversity impacts are minimal. Minor indirect risk may occur from sourcing construction materials from external quarries.	Minor during construction Negligible during operation
ESS8: Cultural Heritage	Risk of the contractor as they excavate exhuming artifacts or otherwise items of special interest culturally and traditionally	Moderate during construction
ESS 10: Stakeholder Engagement	Exclusion of certain groups (e.g., women, minority groups, persons with disability) from consultation; lack of access to information or a functional grievance mechanism, leading to unresolved complaints.	- substantial during construction - substantial during operation

8. Environmental and Social Management Plan

Table 2 below proposes E&S mitigation measures, including methods, responsibilities, frequency, and cost planning for alleviating the adverse risks and impacts, during construction and operation phases of the subproject.Table 2: Environmental and Social Management Plan

#	Risks/ impacts	Mitigation	Methods/ tools/ resources	Responsibility	Monitoring indicators	mProjct Phase	Timeline/ frequency	Cost (USD)
1	Inadequate E&S Management **(ESS1)**: Failure to manage risks as planned. Inadequate assessment and management of E&S risks	- Develop this detailed ESMP based on the ESMF. Integrate all E&S plans (LMP, OHS, SEP, GM, WMP, GBV Plan) into project design and contracts. - Increase knowledge on World Bank's ESF and World Bank Group's EHSGs	- Contractual clauses - C-ESMP approval process - Qualified personnel	- Contractor, - State Project Coordination Unit (SPCU)	- Approved C-ESMP in place. - E&S clauses included in contract. - Monthly E&S reports submitted by contractor. No. of SEP Consultations held	- Construction	- Pre-construction and throughout construction	- 1000

#	Risks/ impacts	Mitigation	Methods/ tools/ resources	Responsibility	Monitoring indicators	mProjct Phase	Timeline/ frequency	Cost (USD)
2	**Labor Risks (ESS2)**: Child/forced labor, gender exclusion, lack of worker, not complying with the national or laws, regulations. GM.	- Implement Labor Management Procedures (LMP). - Verify worker ages (no one under 18); prohibit forced labor. - Actively recruit women for suitable roles. - Awareness raising of all project implementers, contractors and primary suppliers on the requirements and implementation of the inclusion plan. - Promote inclusion of disadvantaged and vulnerable groups in consultations and access to project benefits. - Ensure each worker knows his/her terms of employment including, job description, pay and leave days. - Promote diversity in recruitment including all disadvantaged and vulnerable groups, PWDs and women. There may be a need to put quotas for gender and PWDs. - Establish and publicize an effective worker GM and confidential SEA/H GM.	- LMP document - Worker contracts, ID checks - Code of Conduct - Worker GM procedure -	- Contractor and SPCU - MoAI (during operation)	- Worker registers show no underage labor. - Records of OHS training and PPE distribution. - Zero major OHS incidents. -Worker GM log is maintained.	- Construction - Operation (except for child /forced work)	- Throughout construction - Throughout operation, where applicable	- 800

3	**Lack of enough OHS measures**	- Provide workers with clean water and segregated, clean sanitation facilities. - Provide all workers with appropriate PPE and conduct mandatory daily/weekly OHS toolbox talks. - Provide hearing protection where necessary (when sound level over 8 hours reaches 85 dB(A)) in compliance with EHSGs. - Use of acoustic insulation materials, isolation of noise source, and other engineering controls. - Address vibration hazards by selecting low-vibration equipment, installing vibration dampening systems, and limiting exposure time to prevent health impacts, as advised by the EHSGs for physical hazards. - Provide temporary shelters for workers to protect against adverse weather conditions and for use as rest areas, ensuring that the work environment accommodates natural elements and supports worker health, as per EHSG recommendations. - Regularly monitor weather conditions for outdoor operations to implement adaptive work schedules, safeguarding workers against environmental risks and aligning with EHSG guidance on occupational health management. - Modify work-rest cycles based on temperature and environmental conditions to prevent heat stress or cold stress, following the EHSG's recommendations for managing thermal stress. - Ensure the proper training and licensing of operators of industrial vehicles,	- LMP - PPE, OHS training records - - Written employment terms and conditions -	- Contractor and SPCU - MoAI (during operation)	Number of PPE distributed; OHS training records; number of toolbox talks conducted; accident/incident reports; availability of sanitation facilities	- Construction - Operation (relevant only to employment terms and conditions)	- Throughout construction - Throughout operation, where applicable	- 1200

		emphasizing the safe operation of such equipment, in line with EHSG requirements for worker safety and training. - Develop and enforce operational protocols, including establishing rights of way, setting site speed limits, mandating vehicle inspections, and outlining specific operating rules and procedures, to enhance site safety consistent with EHSG standards. - Utilize mechanical aids to reduce physical exertions associated with manual handling tasks, such as lifting materials and operating tools, to minimize the risk of musculoskeletal disorders, in accordance with EHSG ergonomic principles. - Integrate regular rest breaks, stretching exercises, and job rotation into work schedules to reduce repetitive strain and fatigue, promoting a holistic approach to worker health and ergonomics as advised by the EHSGs.						

#	Risks/ impacts	Mitigation	Methods/ tools/ resources	Responsibility	Monitoring indicators	mProjct Phase	Timeline/ frequency	Cost (USD)
4	CoC and GBV/SEAH cases	- Implementation and monitoring of GBV / SEAH Response and Action Plan - GBV sensitization sessions for community members - GBV awareness sessions for site workers - Engage a dedicated specialist to support oversight and management of these risks - Workers to sign a strict CoC and include clear penalties in case of violation - Include a dedicated GBV/SEAH mechanism within the workers' GM	- GBV/SEA/SH Response and Action Plan - Code of Conduct within the, written work agreement - Sensitization sessions - GBV/SEAH dedicated GM	- Contractor and SPCU - MoAI (during operation)	- Reduced cases of CoC violation - No GBV/SEA/SH cases - GBV/SEA/SH sensitization campaigns are in place and implemented Dedicated GM is in place and being used	- Construction - Operation, where applicable	- Throughout construction - Throughout operation, where applicable	- 700
5	**Pollution (ESS3):** Dust, noise, vibration, and vehicle emissions.	- Implement dust suppression measures (e.g., regular water spraying on roads/stockpiles). - Schedule high-noise/vibration activities during standard daytime hours. - Ensure all vehicles and machinery are well-maintained and have emission certificates.	- Water truck/sprinklers - Work scheduling - Vehicle maintenance logs	- Contractor with the monitoring of the SPCU dedicated team - MoAI (during operation)	- Pollutants' levels are within allowed thresholds - Visual checks show minimal dust. - No community complaints about noise/dust. Vehicle maintenance logs are current.	- Construction - Operation, where applicable	- Daily during construction - Throughout operation, where applicable	- 2000

#	Risks/ impacts	Mitigation	Methods/ tools/ resources	Responsibility	Monitoring indicators	mProjct Phase	Timeline/ frequency	Cost (USD)
6	Excessive use of water and energy	- Train workers on the importance of resource conservation. - Promote the use of water-saving techniques, such as low-fixtures or water recycling systems. - Regularly check generators, machinery, and electrical equipment for abnormal use of fuel/electricity - Minimize work during high temperatures and ensure proper cover for water reservoirs. - Review records of consumption to facilitate monitoring and adjustments	Water and energy records and bills Maintenance manuals and repair reports	- Contractor - MoAI (during operation)	- Metering is within acceptable quantities - Water saving devices/fittings are used - Grey water can be reclaimed for gardening - Use of energy efficient equipment and devices - Use of alternative solar power sources - Awareness is raised Reduced complaints	- Construction - Operation	- Daily during construction - Daily during operation	- 500

#	Risks/ impacts	Mitigation	Methods/ tools/ resources	Responsibility	Monitoring indicators	mProjct Phase	Timeline/ frequency	Cost (USD)
7	Waste & Hazardous Materials: Soil/water pollution, community safety hazards from waste.	- Implement a Waste Management Plan (WMP). - Segregate waste into labeled bins (general, hazardous). - Store hazardous materials (fuel, oil, paint) in a secure, bunded area. - Ensure disposal of generated solid waste (construction waste, in particular) at designated and authorized disposal site consistent with the local and international requirements (see WBG General EHS Guidelines) - Implement waste segregation to prevent mixing hazardous and non-hazardous wastes - Identify potentially recyclable materials - Provide on-site or off-site transportation of waste to prevent or minimize spills, releases, and exposure to employees and public - Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal by the contractor – Project GM	- WMP document -Labeled bins, secure storage area -Waste disposal records -GM complaints related to waste management	- Contractor - MoAI (during operation)	- Waste segregation is practiced on-site. - No evidence of illegal dumping. - Hygienic conditions are prevailing No community complaints about odor/insects/rodents	- Construction - Operation, where applicable	- Daily during construction - Throughout operation, where applicable	- 1000

#	Risks/ impacts	Mitigation	Methods/ tools/ resources	Responsibility	Monitoring indicators	mProjct Phase	Timeline/ frequency	Cost (USD)
8	**Community Health & Safety (ESS4)**: Spread of disease to the community, physical hazards to MoAI staff. Improper site management	- Enforce a strict worker's Code of Conduct (CoC). - Provide workers with clean water and segregated, clean sanitation facilities. - Secure the site with fencing and clear warning signs. - Prevent unauthorized access to the site - Ensure health awareness sessions on communicable diseases.	- Signed CoCs - Site fencing, signage - Regular site inspections - Health awareness materials	Contractor	- The site is securely fenced with clear signage. - CoC signed by all workers. - Community GM is functional, and log is maintained. Records of stakeholder consultations.	Construction	Throughout construction	1200
9	Potential risks of intimidation, abuse, or conflict between security personnel and community members, especially at project sites.	- Train security personnel in community engagement and human rights. - Ensure security measures are proportional to the actual risks, and establish a grievance mechanism for reporting any incidents involving security personnel. - Monitor the conduct of security staff regularly.	- Training sessions - GM for complaint resolution	- Contractor and SPCU - MoAI (during operation)	- Cleared background before deployment - Signed CoC - Reduced number of cases - Increased number of of training Dedicated GM is in place and improving	- Construction - Operation	- Throughout construction - Throughout operation	- 700

#	Risks/ impacts	Mitigation	Methods/ tools/ resources	Responsibility	Monitoring indicators	mProjct Phase	Timeline/ frequency	Cost (USD)
10	Traffic and road safety hazards	- Establish site speed limits, implement safe routes, and coordinate with local authorities. - Rais awareness on road rules and safety - Ensure appropriate GM in place	- Communication with traffic authorities - Awareness campaigns - GM	- Contractor and SPCU - MoAI (during operation)	- Speed limits are monitored - Awareness campaigns are held - Traffic related cases are reduced Community complaints are reduced	- Construction - Operation	- Throughout construction - Throughout operation	- 800
11	Lack of preparedness for emergencies (e.g., fire, accidents) could lead to harm to local communities and the workers on the site	- Develop and implement an Emergency Preparedness and Response Plan (EPRP) specific to civil and excavation works. - Conduct regular emergency drills with workers and community members. - Ensure availability of functional fire safety equipment. - Ensure availability of emergency surveillance and response measures	- EPRP - Emergency drills and community participation - Fire safety equipment, surveillance/first aid equipment and measures	- Contractor and SPCU - MoAI (during operation)	- EPRP is in place, used, and maintained - Fire safety equipment is in place - Other emergency surveillance equipment and measures are in place - Emergency drills are held Related cases are reduced	- Construction - Operation	- Throughout construction - Throughout operation	- 900

#	Risks/ impacts	Mitigation	Methods/ tools/ resources	Responsibility	Monitoring indicators	mProjct Phase	Timeline/ frequency	Cost (USD)
12	Land Acquisition Restrictions on land use and Involuntary Resettlement **(ESS5)**	- Provide legally owned land with FGS documentation - Avoid forced evictions on the site. - Undertake public consultations for clearance - Implement the Project's RPF to account for any relevant case	- Leasehold, letters of ownership issued by the relevant FGS Institution. - Meetings: Work closely with the Local government.	SPCU, MoAI	Land Ownership documentation	- Construction	- Before commencement of works	Not applicable
	ESS6: Minor indirect biodiversity impacts from sourcing construction materials from external quarries.	Ensure construction materials (sand, gravel, aggregates) are sourced only from licensed and environmentally approved quarries. Avoid extraction from protected areas, riverbanks, or ecologically sensitive zones. Contractors will verify supplier compliance with local environmental regulations.	Supplier verification, procurement records, site supervision	- Contractor and SPCU	Records of licensed suppliers; no materials sourced from protected or illegal extraction sites	Construction	Periodic verification during material procurement	500

#	Risks/ impacts	Mitigation	Methods/ tools/ resources	Responsibility	Monitoring indicators	mProjct Phase	Timeline/ frequency	Cost (USD)
13	Cultural Heritage **(ESS8)**	- Adopt chance Finds as described in the S-FSRP ESMF. - Include this clause in the bidding documentation, and C-ESMP - Take the winning contractor through the procedure of the ´Chance Finds´	- Meetings, Training, Reporting	PIU, Contractor	No. of incidents reported and recorded	- Construction	Throughout Construction Phase	500
14	**Stakeholder Engagement and Information Disclosure (ESS 10:)** Women excluded from decision-making.	**SEP:** - Implement the project SEP, ensuring women and all vulnerable persons from the Ministry and neighbouring areas are consulted. - Ensure the GM is accessible and known to all stakeholders	- Meetings - Awareness campaigns - SEP and communication strategies/public relations	- SPCU - MoAI (during operation)	number of grievances received and resolved through GM	- Construction - Operation	- Pre-construction - Construction - Operation	- 800
			-	-		-	-	-

Table 3: Capacity Building Plan

Target Staff	Topic	Timeline/Frequency	Type of Training	Resources	Cost Estimate (USD)
Contractor	- E&S Clauses mandatory in the bids	Before bidding submission	Indoor training	SPCU E&S Specialists	500 Part of SPCU operational/training budget
Contractor's Project Manager, Project Engineer, and OHS/E&S Officer and Foreman	- C-ESMP Implementation - OHS Procedures & Emergency Response - Waste Management Plan - Worker & Community GM	At project start-up	F2F Workshop / On-site training	SPCU E&S Specialist	1,200 the Contractor is required to incorporate the ESMP implementation budget into the Bill of Quantities (BoQ) as part of their contract price
SPCU E&S Specialist & Supervising Engineer	- Supervising and Monitoring the ESMP - World Bank ESF requirements - Reviewing contractor reports	At project outset, quarterly refresher	F2F Workshop / Online course	WB E&S Specialists, external consultant	800 Part of NPCU operational/training budget
All Construction Workers	- OHS (use of PPE, site safety rules) - Worker Code of Conduct - Worker GM Introduction, GBV/SEA/SH Prevention, sub project Security management	At induction & weekly toolbox talks	On-site toolbox talks	Contractor's OHS Officer	500 Included in contract price
Contractor management team, supervisors, drivers and site logistics staff	Traffic & Road Safety Management (ESS4) and Security Risk Management • Safe vehicle operation and transport safety • Site speed limits and pedestrian safety	Before construction and refresher every 6 months	Workshop / On-site training	Contractor's EHS Officer and Security Supervisor	$900

Target Staff	Topic	Timeline/Frequency	Type of Training	Resources	Cost Estimate (USD)
	• Coordination with Puntland security forces • Site perimeter protection and incident reporting • Community interaction and non-violent communication				
Contractor engineers, supervisors and E&S staff	Pollution Prevention & Resource Efficiency (ESS3) • Fuel storage and handling • Spill prevention kits • Dust and noise management • Machinery emission control • Wastewater handling and energy conservation	At project start-up and refresher every 6 months	Workshop / On-site demonstration	Contractor's Environmental Specialist	$400
Workers handling chemicals, fuels and paints	Hazardous Materials Handling • Safe storage and labeling • Spill response procedures • Safe waste disposal	Before hazardous material use and refresher every 6 months	On-site practical training	Contractor's EHS Officer	$300
Excavation workers, engineers and supervisors	Chance-Finds Procedure (ESS8) • Excavation protocol • Cultural heritage protection • Notification chain and reporting procedures	Before excavation works begin	Toolbox training / briefing	Contractor's Environmental Officer	$300

8. Implementation Arrangements

7.3 Government Responsibilities

The overall responsibility for the works sits with the Ministry of Agriculture and irrigation (MoAI) as the main recipient and implementer of the project. The work is overseen by the State Project Coordination Unit (SPCU) embedded within the Project's institutional structures. The SPCU will contract contractors to undertake the construction of the office block. The construction company will implement the project including all Environmental and Social (E&S) mitigation measures defined in this ESMP for the office building.

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

Table 4: Institutional partners' responsibilities

MoAI	The MoAI is responsible for the overall implementation of the Project including monitoring of implementation of this ESMP.
SPCU	SPCU Engineers and E&S safeguard team have prepared the design for the works and this ESMP. They will oversee the implementation of the works by the contractor and supervise implementation of the environment and social management plan
Contractor	• The contractor will implement the works based on the agreed design by adopting best construction codes and most environmentally-sound design measures • The Contractor will prepare a Contractor's ESMP (C-ESMP) before commencing work, by adopting all pertinent E&S management measures in this site-specific ESMP, and customizing them according to the site and work specifics • The Contractor will be responsible for implementing their C-ESMP throughout the contract lifetime.
MoERCC (Ministry of Environment, Range and Climate Change)	• • Provide regulatory oversight under the Puntland EIA Act (2023). • Conduct periodic environmental inspections. • Verify waste disposal, site clearance, and pollution prevention compliance.

8.2. Contractors and Sub-contractors

The contractor is responsible for complying with requirements for all field activities covered by this ESMP, the contractor is also responsible for ensuring that all its sub-contractors follow the ESMP and other ESF instruments that apply to this subproject. The contractor will have contractual clauses specifying compliance with the mitigation measures listed in the ESMP and in the WBG EHS Guidelines, in addition to national requirements and to indicate measures taken in cases of non-compliance. The contractor is also responsible for the actions of any sub-contractors they may engage. Sub-contractors also have to comply with all E&S standards as laid out in this ESMP. The contractor's responsibilities include:

- Ensure that all operations comply with the mitigation measures laid out in this ESMP, for which the contractor is responsible.

- Ensure that the control measures provided for in the ESMP are both understood and implemented by site personnel.
- Comply with accident and incident reporting as laid out in the ESMF. All severe incidents must be reported through SPCU to the Bank within 48 hours of occurrence.
- Set up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies.
- Monitor the ESMP implementation, against the monitoring indicators laid out in this ESMP and the C-ESMP.
- Participate in community consultative meetings.
- Identify additional significant matters pertaining to environmental and social compliance.
- Liaise with SPCU on the need for corrective action in the event of unexpected environmental or social problems emerging during the course of operations.
- Communicate with all staff regarding E&S compliance requirements and other matters of importance.
- Identify additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Prepare and share periodic reports on all aspects of E&S compliance.
- Maintain lists of all workers, including their age and gender including attrition levels.
- Develop and maintain a workers 'grievance mechanism.
- Prepare and maintain an OHS Plan and provide training to all workers on OHS Plan.
- Ensure signing of code of conduct by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.
- Implement the Security Management Plan.
- Undertake workers training on OHS, GM and SEAH
- Undertake periodic stakeholders 'engagements with the local communities.

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

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

- Ensure PPE for workers is available and workers are trained in its use
- Provide OHS training to all workers, based on the OHS Plan
- Ensure health and safety of all workers at the construction site
- If necessary, stop the works to ensure safety
- Maintain records of accidents and incidents and ensure appropriate reporting of incidents to SPCU

- Ensure waste management procedures are followed closely
- Ensure availability of water and sanitation facilities for all workers at site and at the campsite
- Conduct toolbox talks for workers
- Train all workers in the CoC and ensure that CoC is signed by every worker
- Liaise closely with the SPCU on training workers on GBV issues, as well as community awareness on GBV
- Maintain workers ʾlists indicating age and gender
- Maintain records of Workers ʾGM

Table 6 below shows key requirements for reporting implementation of the ESMP throughout construction, which will also extend throughout the life cycle of the subproject.

Table 5: Reporting Plan

Reporting Description	Who? (From)	To Whom? (To)	How?	When? (How frequent?)
Serious OHS Incident (fatality, serious injury)	Contractor	SPCU E&S Specialist / Supervisor	Telephone call, then email report	Immediately (within 24 hours)
GBV/SEA/SH cases/incidences	Contractor	SPCU	Report (Use of the reporting format)	Immediately in 24 hours
Monthly E&S Compliance Report	Contractor	SPCU E&S Specialist / Supervisor	Formal written report	Monthly
GM Log & Status Update	Contractor / GM Focal Point	SPCU E&S Specialist	Email / Report	Monthly
Quarterly Project Progress Report (with E&S section)	NPCU	World Bank	Formal report via official channels	Quarterly
Sub project progress report	PM	NPCU/DG MoAI	Progress Reports	Quarterly

9. Public Consultation and Feedback

9.1 Introduction

Stakeholder consultation is an important component of the environmental and social assessment process and helps ensure that the proposed construction of the Ministry of Agriculture and Irrigation (MoAI) office in Garowe reflects the needs and concerns of relevant stakeholders. Consultations for this subproject were conducted during the environmental and social screening stage, project design discussions, and follow-up engagement with relevant institutions located near the project site.

The consultation process aimed to inform stakeholders about the proposed project, gather their views on potential environmental and social impacts, and incorporate their feedback into the project design and this Environmental and Social Management Plan (ESMP). The engagement process followed the principles of transparency, openness, and participation and is consistent with the requirements of the World Bank Environmental and Social Framework, particularly ESS10 on stakeholder engagement.

Overall, stakeholders expressed strong support for the project, noting the importance of having a modern ministry building that can improve coordination of agricultural programs and service delivery. At the same time, they raised practical concerns related to construction impacts, access to the area, and availability of services for staff.

9.2 Objectives of Stakeholder Consultation

The consultation process aimed to:

- Inform relevant stakeholders about the purpose, location, and components of the proposed MoAI office construction project.
- Gather stakeholder views regarding potential environmental and social risks during construction and operation.
- Identify practical concerns related to access roads, utilities, worker safety, and surrounding institutions.
- Ensure transparency in project planning and decision-making.
- Strengthen collaboration between the Ministry, nearby institutions, and local authorities.
- Establish a basis for continuous communication and use of the Grievance Mechanism (GM) during project implementation.

9.3 Stakeholders Consulted

Consultations involved several stakeholders associated with the project location, including:

- Management and staff of the Ministry of Agriculture and Irrigation (MoAI);
- Representatives of the nearby High Court located close to the project site;
- Garowe local government authorities responsible for land administration and planning;
- Utility service providers such as NECSOM responsible for electricity supply;
- Project engineers and technical staff from the State Project Coordination Unit (SPCU).
- Ministry of Public Works, Housing and Transport, which reviewed the architectural and engineering design of the proposed building

Stakeholders confirmed that the proposed land parcel is public land allocated for government institutions and that the documentation supporting land allocation is legitimate.

9.4 Issues Raised During Consultations

The main issues raised during consultations are summarized below.

a) Support for the Project

Participants generally welcomed the project and emphasized the importance of having a permanent facility for the Ministry of Agriculture and Irrigation. Stakeholders noted that the new building would improve coordination of agricultural programs and strengthen service delivery to farmers and rural communities.

b) Construction Impacts

Representatives from the nearby High Court raised concerns about potential dust from construction activities and from the existing unpaved access road used by vehicles in the area. They requested that dust control measures be implemented during construction.

c) Access Road Conditions

High Court representatives also suggested the possibility of jointly upgrading the shared access road to an asphalt road in order to improve access to the government institutions in the area. The Ministry acknowledged the importance of improving the road; however, it was explained that the current project budget does not include construction of an asphalt road. The suggestion will be communicated to relevant authorities for possible consideration in future infrastructure planning.

d) Transport Access for Staff

Some MoAI staff expressed concern about the availability of public transportation to the new ministry location, as the area is designated primarily for government institutions and public transport services are limited. The Director General of MoAI responded that the ministry will make arrangements to provide staff transport once the building becomes operational.

e) Staff Facilities

MoAI staff also noted that there are currently no nearby restaurants or refreshment facilities in the area. In response, the Director General confirmed that the building design includes a cafeteria within the ministry compound to serve staff and visitors.

f) Electricity Supply

The electricity service provider (NECSOM) confirmed that the electricity grid is already available near the project site and supplies nearby government buildings, including the High Court. Therefore, electricity connection for the new ministry building is technically feasible.

g) Land Ownership and Planning

Garowe local government authorities confirmed that the project site is public land designated for government institutions and that the documentation provided by the Ministry is valid.

9.5 Consultation Summary Table

Table 6: Summary of Stakeholder Consultation

Stakeholder Group	Key Issues Raised	Expectations / Suggestions	How Addressed in the ESMP / Project Design
MoAI Management and Staff	Worker safety during construction	Ensure safe construction practices and strong OHS measures	OHS measures and contractor safety obligations included in ESMP
MoAI Staff	Limited public transportation access to the project location	Provide transport arrangements for staff	Ministry confirmed transport arrangements will be organized for staff
MoAI Staff	Lack of nearby restaurants or refreshment facilities	Include food and refreshment facilities within the building	Project design includes a cafeteria within the ministry building
Nearby Institution (High Court)	Dust from construction activities and unpaved access road	Implement dust control measures during construction	Dust suppression measures included in ESMP
Nearby Institution (High Court)	Request to jointly upgrade the access road to asphalt	Consider future road improvement	Request acknowledged; outside current project scope but may be considered in future planning
Garowe Local Government	Verification of land ownership and planning status	Confirm land allocation and documentation	Authorities confirmed the site is public land designated for government institutions
Electricity Service Provider (NECSOM)	Availability of electricity supply	Coordinate connection to the nearby electricity grid	Electricity connection confirmed feasible due to existing nearby grid infrastructure
Ministry of Public Works, Transport & Housing	Building layout organization, compliance with government construction standards, and technical review of architectural design	Ensure design follows national building standards and functional organization of government facilities	Design comments reviewed and incorporated into the revised architectural drawings and final building design

10. Grievance Mechanism

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. This Project GM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The Project provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the Grievance Redress Mechanism (GM) for the Project.

The MoAI has the responsibility to resolve all issues related to the Project in accordance with the laws and the World Bank ESSs through a clearly defined GM that outlines its process and is available and accessible to all stakeholders. The entry point for all grievances is the social safeguards specialist at the SPCU, who receives grievances by phone, text or email to publicized mobile phone lines and email addresses. The social safeguards specialist will acknowledge, log, forward, follow-up grievance resolution and inform the complainant of the outcome. The complainant has the right to remain anonymous, in which case the identifying details will not be logged. The SPCU senior social specialist will carry out training of social officers and project officers on complaints handling and reporting. Grievances may also be submitted to the contractor. Who will aim to handle grievances and solve them or feed the cases into the established Project GM described here where applicable.

The S-FSRP Grievance Mechanism (GM) is established to allow workers and project-affected persons (primarily MoAI staff) to raise concerns and have them resolved in a timely and transparent manner. The subproject actors will be appropriately trained before commencement of works (please refer to S-FSRP GM Manual for detail).

- **Structure:** The GM will be managed by a designated GM Focal Point within the SPCU, who has already been appointed and is responsible for receiving and coordinating resolution of project-related grievances**.**. The Contractor will also have a site-level focal point/person to receive immediate complaints, who is well-trained in grievances and has experience.
- **Channels:** Grievances will be submitted through:
  - Direct communication (in-person or by phone) with the GM Focal Point or Contractor's representative.
  - A suggestion/complaint box will be placed at a visible and accessible location at the site entrance.
  - Email to a dedicated project email address.
- **Process:** All grievances will be logged. Receipt will be acknowledged within three (3) working days. A proposed resolution will be provided within 15 working days. The complainant will be kept informed of the process.
- **GBV/SEA/SH:** A separate, confidential reporting channel will be established for any complaints related to Gender-Based Violence or Sexual Exploitation, Abuse, and Harassment. This channel will provide a survivor-centered approach, ensure confidentiality, and refer survivors to appropriate support services. These cases will not be handled through the standard GM. MoAI's existing Grievance Redress (GR) channel is a toll-free hotline, accessible by dialing 3060.
- **World Bank GRS:** Stakeholders will be informed that if they are not satisfied with the resolution provided by the project-level GM, they have the right to escalate their concerns to the World Bank's Grievance Redress Service (GRS).

11. ESMP Implementation Budget.

The implementation of this Environmental and Social Management Plan (ESMP) shall be fully integrated into the Contractor's scope of work. Accordingly, the Contractor is required to incorporate the ESMP implementation budget into the Bill of Quantities (BoQ) as part of their contract price. This shall cover all environmental, health, and safety (EHS) management requirements during the sub-project life cycle, including staff, training, PPE, monitoring, stakeholder engagement, and other related safeguard measures necessary for effective ESMP compliance.

All costs associated with the preparation and implementation of the Contractor's Environmental and Social Management Plan (C-ESMP) shall therefore be borne by the Contractor and reflected within the BoQ under relevant sections, ensuring that no separate budget allocation is required for ESMP implementation outside the contract value.

Table 7: Indicative budgetary requirements for implementing the ESMP

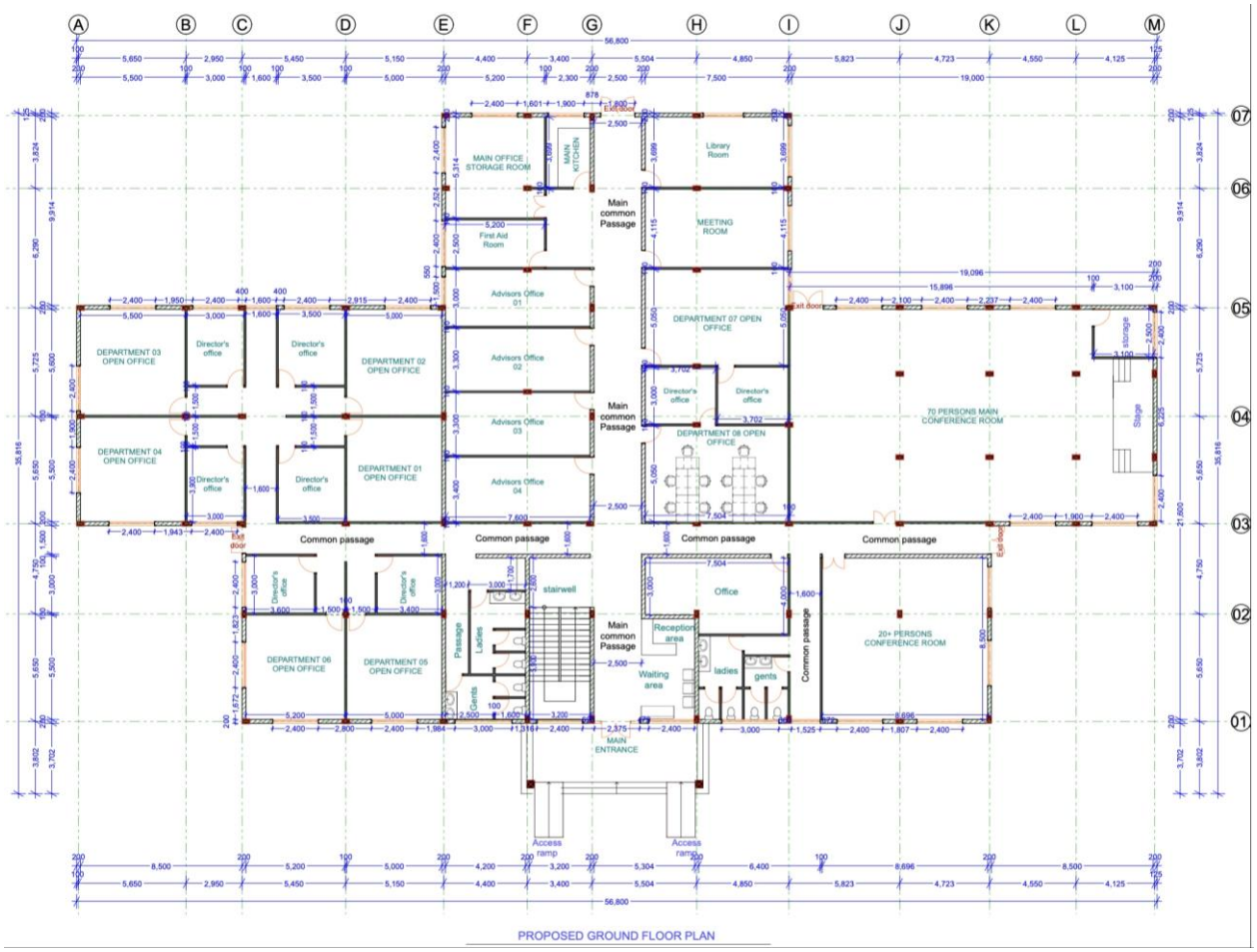
#	Activity/ Resources	Cost estimate (US$/yr)
1	Construction Phase Mitigation Costs	$20,000
2	Operational Phase Mitigation Costs (Five Years)	$10,000
3	Monitoring and Supervision	$3,000
4	Capacity Building	$5,000
5	GM Implementation Costs	$1,000
	Total	**$39,000**

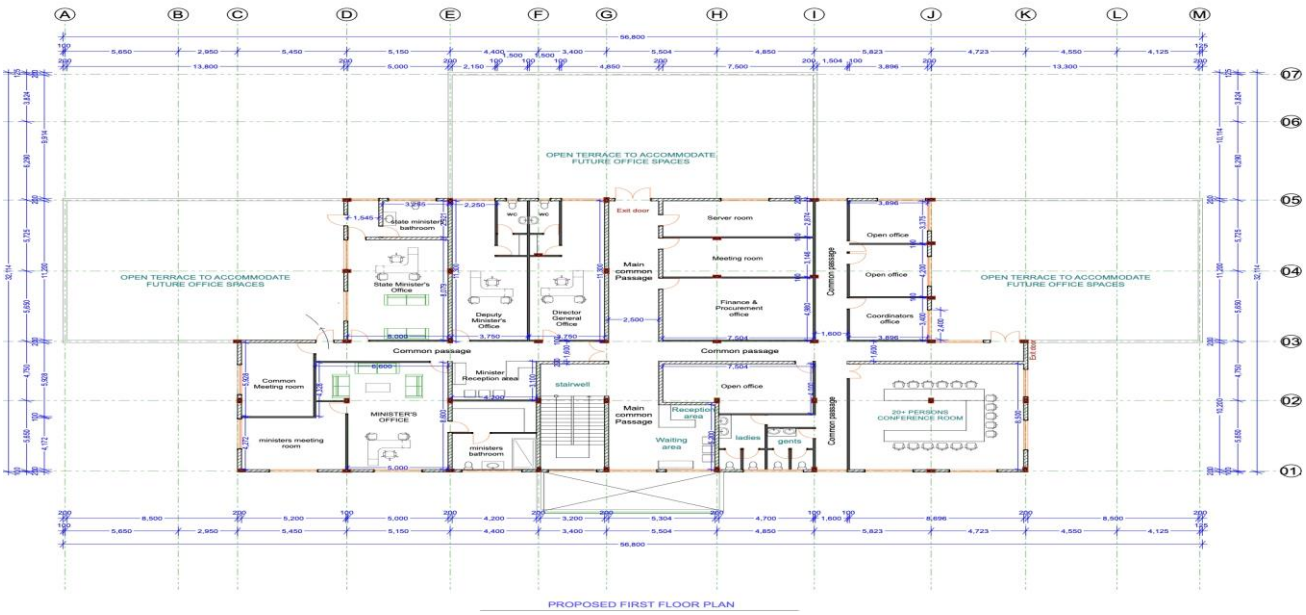
12. References

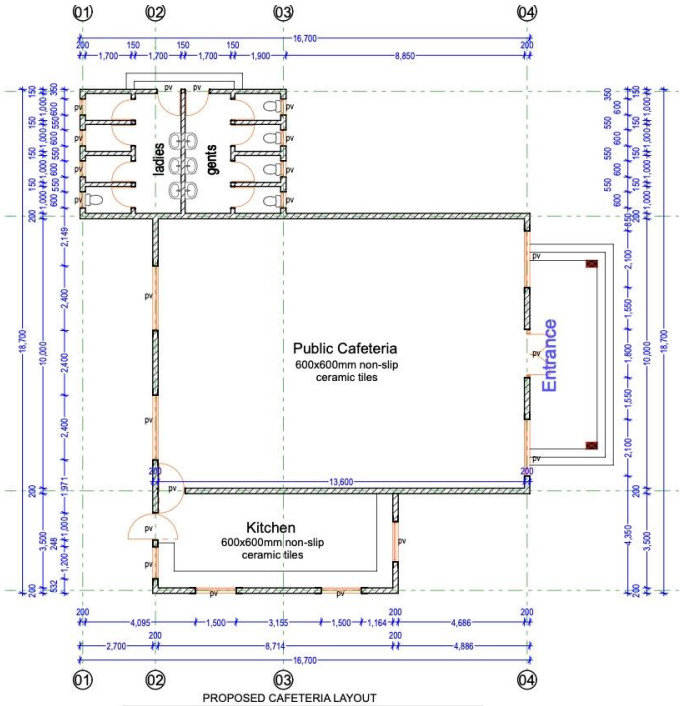
- The World Bank Environmental and Social Framework (ESF), 2018
- The World Bank Group General Environmental, Health, and Safety (EHS) Guidelines, 2007
- Project-level Environmental and Social Management Framework (ESMF)
- Sub-project Bill of Quantities (BOQ) for MoAI Office Building

1. Annexes

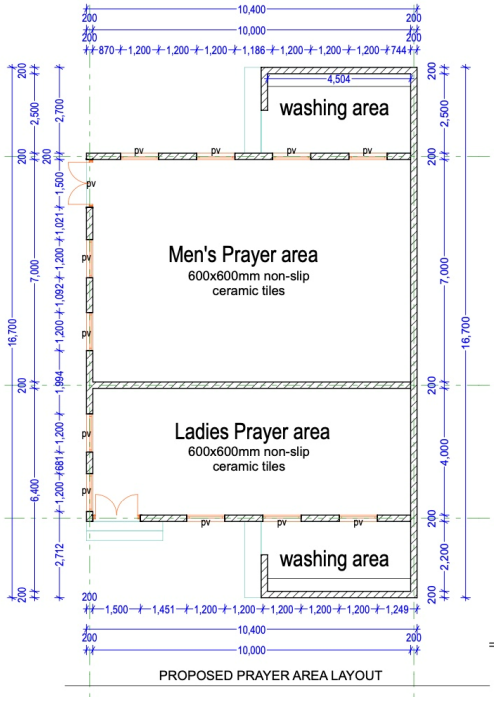
Annex 1: Technical Designs/Site Layout Drawings



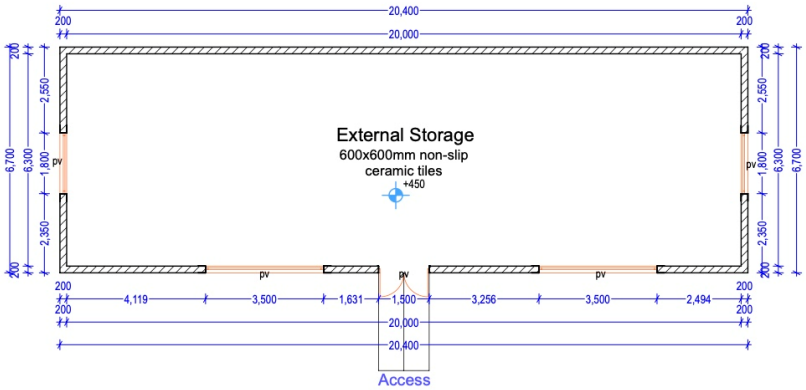




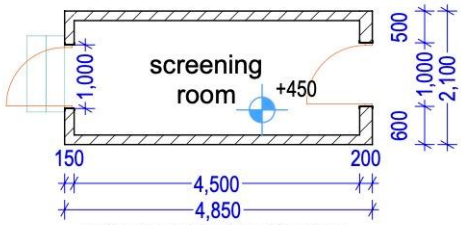
PROPOSED CAFETERIA LAYOUT



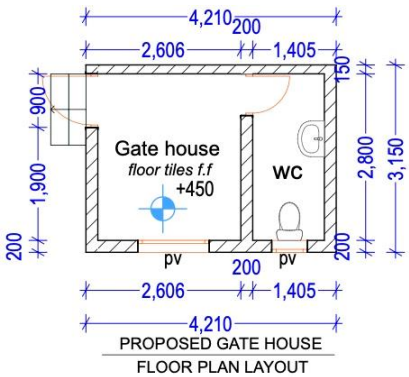
PROPOSED PRAYER AREA LAYOUT



PROPOSED EXTERNAL STORAGE AREA
FLOOR PLAN LAYOUT



PROPOSED SCREENING ROOM
FLOOR PLAN LAYOUT



PROPOSED GATE HOUSE
FLOOR PLAN LAYOUT

Annex 2: Land Ownership

778607578-13399

DOWLADDA PUNTLAND EE SOMALIA

PUNTLAND STATE OF SOMALIA

Shahaadada Lahaanshaha Hantida Ma Guurtada Ah / Property Ownership Certificate

Taariikhda Diiwaangalinta:	02-07-2025
Ciwaanka Waddada:	123 6th Avenue, Wadajir, 70109 Garowe, Puntland, Somalia
Cabbirka Dhulka:	8400 Sq.Meters

Magaca Mulkiilaha

WASAARADDA BEERAHA IYO WARAABKA DPL

Tani waa warqada lahaanshaha Hantida Ma Guurtada ah oo asal ah. Lama ogola in la daabaco

This is the original Property ownership certificate on file. It is illegal to make copies of this certificate

DUQA DOWLADDA HOOSE EE DEGMADA GAROOWE

Abdale Mohamed Abdale
XOGHAYAHA DEGMADA

DAWLADA HOOSE EE DEG. GAROOWE
THE LOCAL GOVERNMENT OF GAROOWE DISTRICT

Abdulkadir Mohamed Mohamud
DUQA DEGMADA

Annex 3: Brief description of the applicable ESSs

The Environmental and Social Framework (ESF)[1] sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards. Below is a short summary of the relevant Environmental and Social Standards (ESSs) for this sub-project[2]:

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

ESS 2 – Labor and Working Conditions. ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers.

ESS 3 – Resource Efficiency and Pollution Prevention 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 pollution prevention and management throughout the project life cycle consistent with Good International Industry Practice (GIIP).

ESS 4 – Community Health and Safety. ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities. Key risks and impacts of the sub-project in regard to community health and safety relate to GBV/SEA-H, pollution and security. Consistent with this, ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. Risk mitigation measures are listed in this ESMP.

ESS 5 – Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement. ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets, or access to assets, leading to loss of income sources or other means of livelihood), or both. The term "involuntary resettlement" refers to these impacts. Resettlement is considered involuntary when affected persons or

[1] World Bank, Environmental and Social Framework (ESF), 2018.

[2] ESS 7 and 9 do not apply to this project. There are no population groups that are included in the relevant criteria of ESS 7..

communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement. Experience and research indicate that physical and economic displacement, if unmitigated, may give rise to severe economic, social and environmental risks: production systems may be dismantled; people face impoverishment if their productive resources or other income sources are lost; people may be relocated to environments where their productive skills are less applicable and the competition for resources greater; community institutions and social networks may be weakened; kin groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help maybe diminished or lost. For these reasons, involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

ESS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources. ESS6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are essential to sustainable development. The standard requires projects to avoid or minimize impacts on biodiversity, habitats, and ecosystem services, and to promote the sustainable use of natural resources in accordance with Good International Industry Practice (GIIP). For this sub-project, the construction site is located in a disturbed urban area with no significant vegetation or natural habitats; therefore, potential impacts on biodiversity are expected to be minimal. Nevertheless, the project will ensure that construction materials are sourced from licensed suppliers to avoid indirect environmental impacts.

ESS 8 – Cultural Heritage. ESS8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. People identify with cultural heritage as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions. Cultural heritage, in its many manifestations, is important as a source 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. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle.

ESS 10 – Stakeholder Engagement and Information Disclosure. This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement has been undertaken for this sub-project, as listed in the section on consultations.

Annex 4: Attendance Sheet for stakeholder Engagement meeting

DAWLADA PUNTLAND
EE SOOMAALIYA

PUNTLAND STATE
OF SOMALIA

Ministry of Agriculture and Irrigation
Wasaaradda Beeraha iyo Waraabka.

Somalia Food Systems
Resilience Project
"P177816

04 September 2025

Attendance Sheet
Consultation for the Construction of the New MoAI Puntland Office Building

No	Name	Institution	Title	Contact Number	Signature
1	Abdihakim Mohamed	MOAI	DG	[redacted]	
2	Nasteho Tahir	PCU	Finance Officer	[redacted]	
3	Amal Mahdi	PCU	Procurement Asst	[redacted]	
4	Mohamed Isse	PCU	COO officer	[redacted]	
5	Fatuma Abdirahman	MOAI	Gen. officer	[redacted]	
6	Mohamed Mohamed Farah	MOAI	Plant protection Director	[redacted]	
7	Saiolo Hassan Hersi	MOAI	Plant protection staff	[redacted]	
8	mohamed osman Abdi	MOAI	Admin & finance	[redacted]	
9	Idna Abdi Said	MOAI	Planning	[redacted]	
10	Mohamed Warsame	MOAI	Crop. Production	[redacted]	
11	Ahmed Ali Nur	MOAI	Extension		
12	Omar mohamud	MOAI	HRM	[redacted]	
13	Ahmed Cafi	MOAI	Extension	[redacted]	

DAWLADA PUNTLAND
EE SOOMAALIYA

PUNTLAND STATE
OF SOMALIA

Ministry of Agriculture and Irrigation

Wasaaradda Beeraha iyo Waraabka.

Somalia Food Systems
Resilience Project
"P177816

04 September 2025

Attendance Sheet

Consultation for the Construction of the New MoAI Puntland Office Building

No	Name	Institution	Title	Contact Number	Signature
14	Mohamed Ali Mohamed	MOAI	officer	[redacted]	[signature]
15	Maxamed mesaud mesed	MOAI	crop/Production	[redacted]	[signature]
16	Ahmed Ali Ahmed	MOAI	meteorology	[redacted]	[signature]
17	Mohamed Abdullahi	MOAI	Archive	[redacted]	[signature]
18	Ali Mohamed Ahmed	MoAI	ICT	[redacted]	[signature]
19	Abdirizak Mohamed	MoAI	Crop production	[redacted]	[signature]
20	Salaam Mohamed Said	MoAI	Production	[redacted]	[signature]
21	Zakarie Mustafa	Irrigation	MoAI	[redacted]	[signature]
22	Mohamed Nuh Moh.	Admin/Staff	MoAI	[redacted]	[signature]
23	Abdirahman Ali Farah	MoAI	Plant Production	[redacted]	[signature]
24					
25					
26					

Official Use Only

Annex 5: Consultation Session Photos

Annex 6: MoAI- Office Building for E&S Screening

Social and Environmental Screening: FSRP	
Projects are screened for their inherent social and environmental risks regardless of planned mitigation and management measures. It is necessary to identify potential inherent risks in the event that mitigation measures are not implemented or fail. This means that risks should be identified as if no mitigation or management measures were to be put in place.	
SECTION A: General Information	
Date of screening	20 August 2025
Activity/Sub project title	Construction of Office Building works for MoAI Puntland State
Activity/Sub project component	Institution building capacity
Implementing Partner	N/A
Proposed activity budget	999,736 USD
Proposed activity duration	12 Months
ES Screening Team Leader and Contact Details	
ES Screening Team Members	Eng Ahmed Abdihakin Mohamed
Site/Activity location	MoAI
New/Rehabilitation project	New
Project Description. Briefly describe project activities, activities that interact with the ES	Construction of a G+1 Office Building for the Ministry of Agriculture and Irrigation (MoAI), Puntland State of Somalia. The building will serve as the Ministry's headquarters and is located in Garowe City
Categorize Project Activities into List A or List B or List C (see above)	Category C

Potential Environmental/Social Risks Impacts of Activities					
Risk Category (Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	I don't know	If these risks ('yes') are present, refer to:	Comments
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is an Environmental and/or Social Assessment required where project is undertaken?	Yes			ESMF	
Is there a risk of diversion of project benefits?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GM)	
Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity?		No		Security Management Plan (SMP)	
Is there a risk that project benefits may not reach truly vulnerable populations?		No		Floods Impact Needs Assessment (FINA) Stakeholder Engagement Plan (SEP)	
Is there a risk that the activity will cause population influx from neighboring areas?		No		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?		No		Security Management Plan (SMP) Grievance Redress Mechanisms (GM)	
ESS 2: Labour and Working Conditions					
Does the activity include any of the known labor rights / ESS 2 non-compliance risks in Somalia (child and forced labor)?	Yes			Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include a construction component?	Yes			Labor Management Procedures (LMP) C-ESMP Occupational Health and Safety Plan (OHS)	

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

Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceutics, industrial chemicals, ozone depleting substances)	Yes			and Safety General Guidelines Integrated Pest Management Plan (IPMP) C-ESMP	
Will the activity result in the generation of dust and noise?	Yes			C-ESMP	
Will the activity result in soil erosion?		No		C-ESMP	
Will the activity produce effluents (waste water)?		No		C-ESMP Waste Management Plan	
Will the activity result in increased levels of vibration from construction machinery?	Yes			C-ESMP	
Will the project produce air pollution? (e.g. significant greenhouse gas emissions, dust emissions and other sources)	Yes			C-ESMP	
Will the activity disturb any fauna and flora?		No		C-ESMP	
Will the activity result in irrigation water with high TDS with more than 1,500 ppm?		No		C-ESMP Waste Management Plan	
Can the project affect the surface or groundwater in quantity or quality? (e.g. discharges, leaking, leaching, boreholes, etc.)		No			
Will the project require use of chemicals? (e.g. fertilizers, pesticides, paints, etc.)		No			
Is there any risk of accidental spill or leakage of material?		No			
ESS 4: Community Health and Safety					
Is there a risk of community exposure to pesticides?		No		Integrated Pest Management Plan (IPMP)	
Is there a risk of communal drinking water pollution through pesticides?		No		Integrated Pest Management Plan (IPMP)	
Is there a risk of increased GBV/SEAH cases due to labor influx?		No		GBV/SEAH Action Plan Labor Management Procedures (LMP)	

Is there a risk of spread of communal diseases due to labor influx?	Yes			Labor Management Procedures (LMP) C-ESMP	
Is there a security risk to the community triggered by project activities?		No		Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GM)	
Will the activity include payments or cash transfers?	Yes			Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GM)	
Will the activity expose community members to physical hazards on the project site?		No		C-ESMP	
Will the activity pose traffic and road safety hazards?		No		C-ESMP	
Will the activity include debris removal that may pose a safety hazard for the community?	Yes			Waste Management Plan	
Is there a possibility that the activity contaminates open wells?		No		Waste Management Plan C-ESMP	
Is there a possibility that the activity spreads pathogens and other pollutants (eg latrines)	Yes			Waste Management Plan C-ESMP	
Can the activity contribute to the spread of disease (eg health facilities)?	Yes			Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	The land is owned by the MoAI of Puntland State
Will the displacement / resettlement affect IDPs?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	

Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GM)	Project is in the City of Garowe
Would the project potentially discriminate against women and girls based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GM)	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to disputes over land ownership?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	The land is owned by MoAI of Puntland State
Will the activity lead to blocked access to people in the area?		No		Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity require acquisition of land or physical buildings or infrastructure?	Yes			Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	This is public land belongs the Ministry of Agriculture and Irrigation
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Are pesticides used in the activity likely to affect important natural resources or ecological functions?		No		Pest Management Plan (PMP)	
Will the activity impact sensitive areas?		No			
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?		No			
Is there a risk that the activity causes loss of precious ecological assets?		No			
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?		No		Stakeholder Engagement Plan (SEP)	
Is there a historical exclusion of disabled persons in the area?		No		Stakeholder Engagement Plan (SEP)	
Is there a lack of social baseline data?		No		ESMF	
Is there a lack of community consultations by the government generally?		No		Stakeholder Engagement Plan (SEP)	
Are women likely to participate in decision-making processes in regards to the activity?	Yes			Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GM) – see ESMF	
Is there a risk that the activity will have poor access to beneficiaries?		No		Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GM) – 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)
	ESS 1: Need for a structured E&S assessment and management process.	Moderate	Develop and implement a project-specific ESMP.
	ESS 2: Labor rights non-compliance (child/forced labor), poor working conditions, and OHS hazards.	Moderate	Implement Labor Management Procedures (LMP) and a robust Occupational Health and Safety (OHS) Plan.

	ESS 3: Pollution from solid/hazardous waste, dust, noise, and air emissions from construction activities.	Moderate	Implement a Waste Management Plan and site-specific controls within a Constractor ESMP (C-ESMP).
	ESS 4: Spread of communicable diseases due to temporary labor influx.	Moderate	Implement worker health and hygiene protocols within the LMP and C-ESMP; manage waste and debris according to a Waste Management Plan.
	ESS 10: Need for active inclusion of women in decision-making.	Moderate	Implement targeted consultation and participation strategies as outlined in the Stakeholder Engagement Plan (SEP).
Is Additional Assessment Necessary? Evaluate the Risks/Impacts and reflect on options (see below)	Screening Result		Summary of Screening Result Justification
	2. Yes 1. Detailed ESMP. Done internally.		The project is correctly categorized as Category C (Moderate Risk). The screening identified multiple, predictable E&S risks across several standards (ESS 1, 2, 3, 4, 10) that are typical for a medium-scale construction project. These impacts are site-specific, largely reversible, and can be managed effectively with standard mitigation measures. Therefore, a detailed ESMP is required. Since the project does not involve involuntary resettlement, significant biodiversity impacts, or impacts on cultural heritage, a full ESIA is not necessary. The SPCU can develop the ESMP internally, guided by the project's ESMF.