SOMALIA FOOD SYSTEMS RESILIENCE PROJECT (FSRP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Activity Title:

Construction of a Veterinary Clinic in Buran District, Puntland

For:

Food Systems Resilience Project (FSRP) – Puntland Component

Project Coordinates:
10°13'23.0"N 48°46'18.1"E

Submitted by:

SPCU, Puntland State

Submitted to:

NPCU,

S FSRP

MOGADISHU, Somalia

Date: December 2025

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LIST OF ABBREVIATIONS

Abbreviation	Definition
AMR	antimicrobial resistance
CAHWs	Community Animal Health Workers
CBD	Convention on Biological Diversity
CCPP	Contagious Caprine Pleuropneumonia
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FSRP	Food Systems Resilience Project
GBV	Gender-Based Violence
GM	Grievance Mechanism
LVD	Voluntary Land Donation
ILO	International Labour Organization
MoAI	Ministry of Agriculture and Irrigation
MoERCC	Ministry of Environment, Range and Climate Change
MoLAH	Ministry of Livestock and Animal Husbandry
NPCU	National Project Coordination Unit
OHS	Occupational Health and Safety
PCU	Project Coordination Unit
PPE	Personal Protective Equipment
PPR	Peste des Petits Ruminants
SEA/SH	Sexual Exploitation, Abuse, and Sexual Harassment
UNCCD	United Nations Convention to Combat Desertification
UNFCCC	United Nations Framework Convention on Climate Change
VLD	Voluntary Land Donation

1. Executive Summary

The Buran Veterinary Clinic subproject is being implemented under the Somalia Food Systems Resilience Project (FSRP) to strengthen livestock health services, enhance pastoral resilience, and improve household livelihoods in Buran District, Puntland. Livestock keeping is the primary economic activity in the district, yet access to veterinary services remains extremely limited, exposing pastoral households to preventable livestock diseases, high mortality rates, and reduced productivity. The establishment of a modern veterinary clinic addresses this longstanding gap and supports FSRP's objective of improving agricultural service delivery and market resilience.

This Environmental and Social Management Plan (ESMP) has been prepared in accordance with the World Bank Environmental and Social Framework (ESF), FSRP Environmental and Social Management Framework (ESMF), and Puntland's Environmental Impact Assessment regulations. It identifies potential environmental and social risks associated with the construction and operation of the veterinary clinic, proposes mitigation and monitoring measures, defines institutional responsibilities, and presents a costed plan for safeguards compliance over a five-year period.

The project site comprises a 40 × 40-meter plot of public land voluntarily allocated by the Buran District Administration, as referenced in document DHB/001 The land is free of disputes, has low environmental sensitivity, and contains only sparse shrubs and rocky surfaces suitable for construction. Baseline assessments confirmed the absence of protected ecosystems, or sensitive receptors within the immediate vicinity. Community consultations demonstrated strong support for the project, with stakeholders emphasizing the need for improved veterinary services, controlled waste management, and local employment opportunities.

The ESMP identifies both positive and adverse impacts. Expected benefits include improved livestock health and productivity, reduced household economic losses, strengthened disease surveillance, local job creation, and improved public health outcomes. Potential adverse impacts—such as limited vegetation clearance, dust and noise, construction waste, occupational health and safety risks, community safety risks, and operational risks related to medical/veterinary waste and wastewater—are site-specific, moderate, and manageable with effective controls; in addition, the SEA/SH risk level is assessed as Low due to the small workforce and limited labor influx, though worker–community interaction risks may still occur if not properly managed.

Key mitigation measures include controlled site clearance and restoration, dust suppression, waste segregation and safe disposal, site fencing and warning signage, PPE provision and OHS training, safe wastewater and drainage management, secure pharmaceutical storage and inventory control, and sharps/clinical waste handling procedures, alongside measures to ensure

equitable access for women and vulnerable groups. To prevent and reduce SEA/SH risks, the ESMP requires a mandatory Worker Code of Conduct, SEA/SH induction and refresher training/toolbox talks, and active supervision with clear sanctions for misconduct. Any SEA/SH-related complaints will be handled through a confidential, survivor-centered GM pathway that ensures informed consent, data protection, no requirement for written evidence, and voluntary referral to qualified GBV/SEA/SH service providers, with monitoring responsibilities assigned to the PCU/PIU, MoLAH, MoERCC, the contractor, the supervising engineer, and clinic management.

The total ESMP implementation cost is **USD 29,000**, covering construction-phase mitigation, five-year operational safeguards, monitoring, capacity building, GM implementation, and contingencies. Capacity building activities target project staff, contractor workers, and clinic personnel to strengthen their ability to manage safeguards risks.

A project-level Grievance mechanism (GM) is established to ensure that concerns raised by community members or workers are addressed promptly, fairly, and transparently. The GM includes multiple reporting channels, record-keeping procedures, clear timelines for resolution, and provisions for confidential handling of sensitive complaints such as SEA/SH cases.

In conclusion, the assessment finds that the Buran Veterinary Clinic presents **moderate, site-specific, and manageable environmental and social risks**. With proper implementation of the ESMP, the project will deliver substantial benefits to pastoral communities while ensuring compliance with safeguard requirements and environmental sustainability.

2. Introduction

This Environmental and Social Management Plan (ESMP) has been prepared for the proposed construction and operation of the Buran Veterinary Clinic under the Somalia Food Systems Resilience Project (FSRP). The ESMP provides a structured approach for identifying, assessing, and managing potential environmental and social risks throughout the subproject lifecycle. It aligns with the World Bank Environmental and Social Framework (ESF), the FSRP Environmental and Social Management Framework (ESMF), and the Puntland Environmental Impact Assessment (EIA) Regulations.

The subproject forms part of FSRP's broader objective to strengthen resilience in Somalia's food systems by improving agricultural service delivery, enhancing market and value chain infrastructure, promoting climate-resilient production systems, and supporting institutional capacity at national and state levels. In Puntland, FSRP prioritizes investments that strengthen pastoral and agro-pastoral livelihoods, including livestock health services, rangeland rehabilitation, water infrastructure, and local governance systems. The establishment of the Buran Veterinary Clinic directly contributes to these goals by improving access to animal health services, reducing livestock mortality, and enhancing the resilience of pastoral households.

Livestock production is the foundation of livelihoods in Buran District and across Somalia, where pastoral and agro-pastoral systems sustain the majority of households. In Somalia, the livestock sector contributes significantly to national GDP and export earnings, forming the backbone of rural income, food security, and mobility for communities that depend on healthy herds for their economic and social well-being.

Despite its central importance, Buran District lacks a modern veterinary facility capable of providing essential services such as disease diagnosis, treatment, vaccination, and emergency livestock care. This service gap leaves livestock keepers vulnerable to preventable diseases, reduced productivity, and avoidable economic losses.

The establishment of the Buran Veterinary Clinic will address this long-standing limitation by improving access to professional animal health services, strengthening disease management, and enhancing productivity and resilience among pastoral households. In doing so, the facility will support both community-level livelihoods and the broader livestock-driven economy on which Somalia heavily relies.

The ESMP identifies potential environmental and social impacts likely to arise during construction and operation, including vegetation clearance, soil disturbance, waste generation, occupational and community health and safety risks, water use, handling of veterinary pharmaceuticals, and management of clinical waste. For each impact, the ESMP outlines mitigation and monitoring

measures, assigns institutional responsibilities, provides implementation requirements, and defines the resources needed to ensure compliance.

In addition to these, other potential environmental and social risks include:

Environmental Risks

- Noise pollution from construction activities, which may disturb nearby residents and livestock.
- Increased traffic and potential road safety hazards due to the movement of construction vehicles and delivery of materials.
- Air emissions from construction machinery and potential incineration of medical waste.
- Soil and water contamination from accidental spills of fuels, lubricants, or chemicals used on site.
- Disruption to local livelihoods if construction activities temporarily limit access to grazing lands or water points.
- Risk of introducing invasive plant species through the movement of equipment and materials, potentially affecting local biodiversity.
- Potential for increased human-wildlife conflict if wildlife is displaced during site clearance or construction.

Social Risks

- Gender-based violence (GBV) and sexual exploitation and abuse (SEA/SH) risks associated with the influx of workers or changes in community dynamics.
- Social tension if local hiring practices are perceived as unfair or if project benefits are not equitably shared.
- Impacts on vulnerable groups, such as women, youth, and people with disabilities, if their access to services or participation in project benefits is limited.

These additional risks will also be addressed through tailored mitigation strategies, stakeholder engagement, and ongoing monitoring to ensure the project's environmental and social compliance and sustainability.

The ESMP is informed by field data from the Buran ESMP Data Collection Checklist, site visits, stakeholder consultations, project designs, land ownership verification, and technical assessments. The designated project site, measuring 40 × 40 meters, is public land officially

allocated by district authorities, referenced under parcel number **DHB/001** The site has low environmental sensitivity, minimal vegetation, no cultural heritage concerns, and is suitable for construction. Community consultations confirmed strong local support for the project and emphasized the importance of improving veterinary service access.

The following sub-sections provide further background and justification for the project.

2.1 Project Background

The Somalia Food Systems Resilience Project (FSRP) is a multi-year initiative financed by the World Bank to strengthen the resilience of food and livestock production systems across Somalia. The project addresses chronic challenges such as recurrent droughts, limited veterinary coverage, degraded rangelands, weak market infrastructure, and frequent livestock disease outbreaks. FSRP supports pastoral and agro-pastoral communities through improved service delivery, climate-resilient infrastructure, and strengthened institutional systems.

In Buran District, livestock is the backbone of the local economy. However, the absence of a functional veterinary facility has left livestock keepers vulnerable to disease outbreaks, preventable animal deaths, and weakened productivity. The proposed veterinary clinic aims to provide essential animal health services, including treatment, disease surveillance, vaccination campaigns, emergency livestock care, and advisory services. This investment forms part of FSRP Component 2, which focuses on developing resilient market and value chain infrastructure. The clinic is expected to significantly enhance local resilience, strengthen livestock-based livelihoods, and support economic stability in the district.

2.2 Purpose of the ESMP

The purpose of this ESMP is to ensure that the Buran Veterinary Clinic subproject is implemented in a manner that avoids, minimizes, or mitigates adverse environmental and social impacts. Specifically, the ESMP aims to:

- Identify potential environmental and social risks associated with project activities.
- Propose mitigation measures that are practical, context-specific, and implementable.
- Ensure compliance with World Bank ESF, FSRP ESMF, and Puntland EIA regulations.
- Define clear roles, responsibilities, and reporting arrangements for ESMP implementation.
- Provide a framework for monitoring, supervision, and capacity strengthening.
- Support meaningful stakeholder engagement and promote community participation.

2.3 Scope of the ESMP

This ESMP covers all phases of the project and activities, including:

- Site selection and land verification
- Pre-construction activities such as site clearing and preparation
- Construction phase risks and mitigation measures
- Operational phase risks such as medical waste management, infection control, water and sanitation, and OHS
- Environmental and social monitoring arrangements
- GM procedures
- Institutional responsibilities
- Capacity building requirements
- Budget for ESMP implementation

The ESMP applies to the PCU, MoLAH, the contractor, supervising engineer, district authorities, and clinic management.

2.4 Methodology for ESMP Preparation

The ESMP was developed using the following methods:

- **Desk review** of FSRP project documents, engineering designs, and national environmental policies
- **Field visit** to assess baseline environmental conditions, land use, access, drainage, and neighboring features
- **Data collection** using the standard ESMP Data Collection Checklist for Buran
- **Stakeholder consultations** with community leaders, women, youth, livestock keepers, and district officials
- **Land verification** through review of official documentation and discussions with local authorities
- **Impact assessment** using a structured environmental and social risk screening tool
- **Development of mitigation measures** consistent with World Bank ESS and local context

2.5 Project Activity Description

The Buran Veterinary Clinic subproject involves the construction of a single-story veterinary center designed to provide essential livestock health services. The facility includes:

- Treatment and examination rooms
- Medicine storage and pharmacy
- Office and administrative areas
- Waiting and consultation area
- Outdoor livestock treatment and handling area
- Sanitation facilities (latrine, handwashing units)
- Water connection from nearby supply points
- Drainage system and soak-away pit for wastewater
- Perimeter fence and gate for controlled access
- Electrical installation with provision for solar power supply

Construction will include land clearing, demolition of one small abandoned structure, excavation, foundation construction, walling, roofing, internal finishing, plumbing, electrical works, site fencing, drainage installation, and external landscaping.

The clinic is expected to improve livestock health, strengthen disease surveillance, reduce losses from preventable conditions, and enhance the resilience and economic stability of pastoralist households in Buran District.

The **construction workforce for Buran Veterinary Clinic is estimated at 20 workers**, comprising **8 skilled** and **10 unskilled** laborers, plus **2 engineers**. The majority (**18 workers**) will be recruited from the **local community**, while only **2 workers (engineers)** are expected to come from **outside the project area**.

Based on this staffing profile, the **construction duration is estimated at 3–4 months** for a small single-story veterinary clinic (site preparation, foundation, superstructure, finishing, and external works).

Labor influx is not expected to be significant because the workforce is predominantly local and only a small number of specialized staff will be external. As a result, **ESS2 and ESS4 labor/community risk levels related to labor influx are low**, with manageable risks limited to standard worker OHS, community safety around the worksite, and worker-community interaction

(to be addressed through the contractor's labor management procedures, Code of Conduct, and site access controls).

These activities fall under **pre-construction**, **post-construction/operational setup**, and **supporting project processes** that are normally required in World Bank ESF-aligned projects.

Other Subproject Activities (Beyond Construction Works Already Listed)

A. Pre-Construction Activities (Before Physical Works Begin)

These activities support planning, compliance, and readiness:

1. **Final land verification, boundary confirmation, and documentation** (including VLD validation where relevant).
2. **Topographic survey and geotechnical assessment** for confirming soil stability and drainage suitability.
3. **Environmental and Social risk screening & approval processes** as required under the ESF and national regulations.
4. **Preparation of Contractor's ESMP (C-ESMP)** including OHS plan, waste management plan, traffic management plan, and labor management procedures.
5. **Stakeholder engagement and community sensitization**, including early disclosure of project information.
6. **Mobilization of contractor staff, equipment, and materials** to site.
7. **Temporary site establishment**, including site offices, material storage areas, sanitation facilities, and water access points.

B. Operational Preparation & Installation Activities (After Construction but Before Opening)

These activities are needed to make the facility functional:

1. **Procurement and installation of veterinary equipment**, including surgical tools, examination tables, diagnostic kits, cold-chain units, and medicine storage cabinets.
2. **Installation of solar power systems** to support lighting, refrigeration, and essential clinic operations.
3. **Set-up of pharmaceutical inventory systems**, including controlled-access drug cabinets.
4. **Development and implementation of waste management systems** for:
    - Sharps (needles, blades)

- Pharmaceutical waste
- Infectious animal waste
- General clinic waste

5. **Training of clinic personnel** (veterinarians, technicians, administrative staff) in OHS, handling of veterinary pharmaceuticals, AMR protocols, and clinical waste procedures.
6. **Establishing administrative systems**, including patient/animal registration, recordkeeping, and service protocols.
7. **Installation of signage**, both internal (directional) and external (clinic identification, safety signs).

C. Community-Level Programmatic Activities

These activities extend the clinic's functions beyond the physical facility:

1. **Community outreach on animal health**, safe medicine use, vaccination schedules, and zoonotic disease prevention.
2. **Livestock disease surveillance initiatives**, reporting, and coordination with district authorities.
3. **Training local Community Animal Health Workers (CAHWs)** on vaccine handling, AMR awareness, and field-level disease detection.
4. **Awareness sessions on AMR**, infection control, and safe disposal of animal medicines (aligned with global findings on antibiotic pollution and AMR spread).
5. **Coordination with local authorities** for waste collection, water access, and joint public health campaigns.

D. Environmental & Social Safeguard Activities

Aligned with World Bank ESF good practice:

1. **Implementation of mitigation and monitoring activities** defined in the ESMP (dust, noise, OHS, community safety, waste management).
2. **Monitoring of wastewater and soak-away systems**, especially due to known risks of antimicrobial residues and resistant pathogens in healthcare/veterinary wastewater in LMIC settings.
3. **Regular reporting to PCU, MoLAH, and MoERCC** on safeguard compliance.

4. **Functioning of the Grievance Mechanism (GM)** throughout construction and operation.
5. **Chance-find procedure activation**, if cultural materials are inadvertently encountered during excavation.

E. Post-Construction and Commissioning Activities

1. **Testing of all building systems** (water, power, drainage, lighting, ventilation).
2. **Clinic certification & operational licensing** by district authorities and relevant sector ministries.
3. **Final inspection and environmental & social compliance audit** before handover.
4. **Official commissioning and handover** to MoLAH/clinic management.

3. Policy, Legal and Institutional Framework

This section outlines the national, state-level, and international policies and regulations that guide the environmental and social management of the Buran Veterinary Clinic subproject. The ESMP has been prepared in accordance with the World Bank Environmental and Social Framework (ESF), the FSRP Environmental and Social Management Framework (ESMF), and the applicable legal requirements of Puntland State of Somalia.

The framework provides the basis for identifying environmental and social risks, implementing mitigation measures, and ensuring compliance with relevant safeguards throughout the construction and operational phases of the clinic.

3.2 National Legal and Regulatory Framework

a. Puntland Environmental Impact Assessment (EIA) Act, 2023

This Act is the primary legal instrument governing environmental and social assessment in Puntland. It mandates that:

- All development projects undergo environmental and social screening;
- Mitigation measures are developed to address identified risks;
- Projects obtain environmental clearance from the Ministry of Environment, Range and Climate Change (MoERCC);
- Regular monitoring and reporting are conducted during construction and operation.
- The Buran Veterinary Clinic ESMP fulfills these requirements.

b. Puntland Environmental Management Law, 2023

This law provides a comprehensive framework for:

- Conservation of natural resources;
- Pollution prevention;
- Waste management practices;
- Protection of soil, vegetation, and water resources;
- Enforcement of environmental standards.

The law is particularly relevant for the clinic's medical waste management, vegetation clearance, and drainage planning.

c. Puntland Labour Law, 2004

This law sets minimum requirements for:

- Safe and healthy working conditions;
- Worker rights and responsibilities;
- Prohibition of forced and child labor;
- Provision of appropriate PPE and medical care for workers.

It aligns closely with World Bank ESS2 (Labor and Working Conditions) and informs contractor OHS obligations.

d. Puntland Water Resources Act, 2003

This Act regulates:

- Sustainable use of piped and groundwater resources;
- Protection of water infrastructure;
- Prevention of contamination from waste disposal.

The veterinary clinic's connection to the town's piped water system must comply with this Act.

e. Puntland Public Health Law, 2007

This law supports:

- Hygienic management of public facilities;
- Prevention of disease transmission;
- Safe handling and disposal of hazardous waste;
- Veterinary and livestock-related public health safeguards.

The clinic's medical waste management and sanitation systems must adhere to this law.

f. Puntland Urban Planning and Construction Code, 2018

This code governs:

- Construction permits;
- Site preparation and building safety;
- Setbacks, drainage, and materials compliance.

The contractor must comply with this code during construction of the perimeter wall, clinic building, and associated structures.

g. Puntland Disaster Risk Management Policy, 2024

This policy emphasizes:

- Integration of climate resilience and disaster preparedness into development projects;
- Community-based early warning systems;
- Strengthening of institutional capacity for hazard mitigation.

The project supports these objectives by enabling disease surveillance and improving community-level veterinary health resilience.

h. **National Gender Policy**
Somalia's National Gender Policy provides overarching policy guidance for advancing gender equality and addressing harmful practices and GBV through coordinated government action and mainstreaming across sectors.

i. **National GBV Strategy (2018–2020) and national GBV coordination mechanisms**
Somalia's National GBV Strategy sets national priorities for prevention, response, survivor support, and coordination among institutions and partners. It provides an important reference for GBV risk mitigation, survivor-centered response, and referral pathways in project contexts.

j. **Sexual offences legal framework and ongoing federal legislative reforms**
Sexual violence and related offences continue to be handled under existing national legal instruments, including the **Somali Penal Code (1962)**, while federal reforms have progressed through drafting and parliamentary consideration of a **Sexual Offences / Sexual Offences and Other Acts of Indecency Bill** intended to strengthen protections and procedures for investigation and prosecution.

3.3 Institutional Framework

Several institutions at regional and district levels hold responsibilities relevant to the ESMP.

a. Ministry of Environment, Range and Climate Change (MoERCC)

The Ministry of Environment, Range and Climate Change (MoERCC) provides regulatory oversight for all environmental aspects of the project, including enforcement of the Puntland EIA Act (2023), review of ESMP implementation, verification of site clearance and waste management practices, and periodic compliance inspections. MoERCC ensures alignment with World Bank ESS1 (risk management), ESS3 (pollution prevention), ESS6 (biodiversity), and ESS8 (cultural heritage), and provides technical guidance to the PCU and contractor throughout project implementation.

b. Ministry of Livestock and Animal Husbandry (MoLAH)

Lead technical agency for veterinary service delivery. Responsible for:

- Overseeing clinic operation
- Assigning veterinary officers
- Ensuring hygiene, disease control, and safe medical waste handling;
- Supporting community awareness on livestock health.

c. Ministry of Agriculture and Irrigation (MoAI)

As FSRP implementing partner, MoAI is responsible for:

- Coordinating safeguards implementation;
- Supervising construction
- Approving contractor's C-ESMP
- Monitoring E&S compliance and reporting to the PCU.

d. Buran Municipality

Municipal authorities are responsible for:

- Land ownership verification and VLD documentation;
- Issuing construction-related permits;
- Supporting solid waste collection and disposal;
- Facilitating community engagement and GM activities;
- Ensuring local compliance with construction and public health regulations.

e. S-FSRP Puntland Project Coordination Unit (PCU)

The PCU ensures:

- Consolidation of E&S reports;
- GM oversight and complaints logging;
- Coordination between ministries;
- Compliance with World Bank safeguards;

- Technical backstopping and E&S supervision support.

f. Contractor and Supervising Engineer

These parties must ensure:

- Implementation of construction-phase mitigation measures;
- Worker safety, PPE provision, and toolbox meetings;
- Safe handling of fuels, materials, and construction wastes;
- Weekly E&S reporting;
- Compliance with ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8, and ESS10 requirements.

3.4 World Bank Environmental and Social Framework (ESF)

The ESF comprises ten Environmental and Social Standards (ESSs). The following ESSs are applicable to the Buran Veterinary Clinic.

Table 1: WB ESSs

ESS	Title	Relevance to the Project
ESS1	Assessment and Management of Environmental and Social Risks and Impacts	Provides the overarching framework for ESMP preparation.
ESS2	Labor and Working Conditions	Applies to all workers; governs OHS, fair treatment, and labor rights.
ESS3	Resource Efficiency and Pollution Prevention	Relevant for waste management, energy use, drainage, and soil protection.
ESS4	Community Health and Safety	Mitigates risks to community members, especially due to proximity to schools.
ESS5	Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	Not triggered; project uses voluntary land donation (VLD).
ESS6	Biodiversity Conservation	Minor vegetation removal requires responsible site clearance.
ESS8	Cultural Heritage	Chance finds procedures apply during excavation.
ESS10	Stakeholder Engagement and Information Disclosure	Mandatory consultations and GM integration throughout the project.

This project component also requires coordination with relevant environmental and social regulatory institutions to ensure compliance with World Bank ESS1 (overall risk and impact management), ESS6 (biodiversity conservation and responsible vegetation clearance), and ESS8 (protection of cultural heritage, including application of

chance-find procedures during excavation). These ESS linkages guide screening, supervision, and monitoring responsibilities throughout the construction and operational phases.

3.5 International Conventions and Agreements

Somalia is a party to several environmental and labor conventions relevant to the project:

- **Convention on Biological Diversity (CBD)** – sustainable management of natural resources
- **United Nations Framework Convention on Climate Change (UNFCCC)** – adaptation and low-carbon development
- **United Nations Convention to Combat Desertification (UNCCD)** – soil and rangeland protection
- **Basel Convention** – controls on hazardous waste disposal
- **ILO Conventions** – protection of worker rights and occupational safety

The project supports Somalia's commitments under these instruments by incorporating climate-smart technologies, adhering to safe labor practices, and managing waste responsibly.

3.6 Compliance and Coordination

Successful implementation of this ESMP requires coordinated action among:

Table 2: Institutional Roles and Responsibilities for ESMP Implementation

Institution	**Key Responsibilities Related to ESMP Implementation**
MoLAH (Ministry of Livestock and Animal Husbandry)	• Lead technical ministry for clinic operations. • Ensure proper veterinary waste management, OHS compliance, and pharmaceutical handling. • Support monitoring and reporting of operational risks.
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.

MoAI (Ministry of Agriculture and Irrigation)	• Safeguards implementation lead for FSRP. • Review and approve Contractor ESMP (C-ESMP). • Coordinate monitoring and consolidate reports for the PCU.
Buran District Administration	• Facilitate community engagement and GM activities. • Verify land allocation and maintain VLD records. • Support local supervision of construction-phase safeguards.
Contractor	• Implement all construction-phase mitigation measures. • Enforce OHS, PPE use, and site safety controls. • Maintain incident logs, waste disposal records, and daily E&S compliance.
Supervising Engineer	• Conduct daily site inspections. • Verify ESMP implementation and issue corrective actions. • Submit E&S compliance reports to the PCU.
PCU (Puntland Project Coordination Unit)	• Provide overall safeguards oversight. • Ensure ESMP integration into contracts. • Conduct supervision missions and compile E&S performance reports.
Clinic Management (Post-Construction)	• Ensure operational controls for wastewater, waste segregation, infection control, and OHS. • Maintain GM, service records, and compliance documentation.

Regular inspections, ESMP compliance audits, and community feedback mechanisms will ensure continuous adherence to safeguard requirements throughout construction and operation.

4. Baseline Environmental and Social Conditions

This section describes the existing environmental and social conditions of the proposed Veterinary Clinic site in Buran District and its surrounding areas. The baseline assessment was conducted through a site visit, direct observations, consultations with local authorities and community members, and review of the ESMP Data Collection Checklist. The information presented provides a foundation for identifying potential project impacts and developing appropriate mitigation measures.

4.1 Location and Accessibility

The project site is located within Buran District, situated in a predominantly pastoral area characterized by sparse settlements and wide grazing zones. The designated plot measures **40 × 40 meters** and is situated within the administrative boundaries of Buran town. The area is easily accessible via the existing district access road, which connects the site to surrounding villages and markets. The road is passable during both dry and wet seasons, allowing for the movement of construction materials and future veterinary service users.

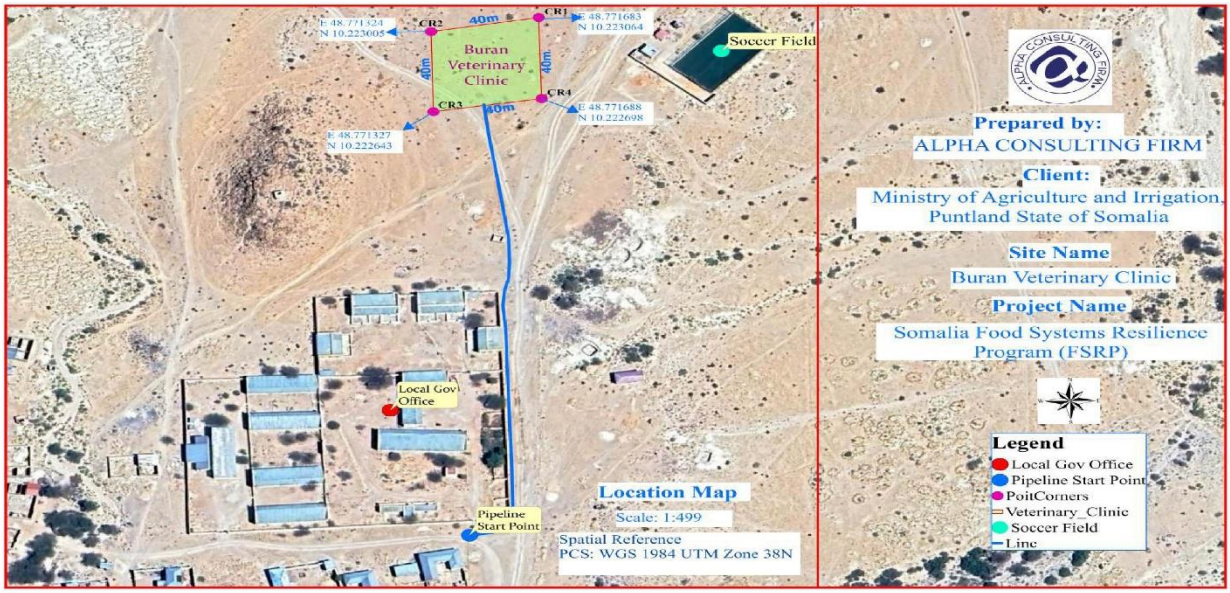


Figure 1: Site map

4.2 Climate and Weather Patterns

Buran District experiences a semi-arid climate with high variability in rainfall. The main climatic seasons include:

- **Gu (April–June)** – the primary rainy season

- **Deyr (October–December)** – shorter, secondary rainy season
- **Jilaal (January–March)** – long dry season
- **Hagay (July–September)** – hot dry season

Temperatures are typically high throughout the year, and rainfall is low and erratic, affecting pasture availability and livestock health. These climatic conditions increase livestock vulnerability to disease outbreaks, underscoring the importance of improved veterinary services.

4.3 Topography and Soil Characteristics

The topography of Buran is generally flat with slight undulations typical of semi-arid rangelands. The project site lies on relatively level terrain suitable for construction. Soils are sandy to sandy-loam with low organic content. The site is free from erosion features, waterlogging, or steep slopes. The ground is firm, allowing for stable building foundations. No significant soil contamination was observed during the assessment.

4.4 Vegetation and Biodiversity

The project site contains minimal vegetation, consisting mainly of scattered grasses and small shrubs commonly found in heavily grazed pastoral landscapes. No mature trees or ecologically sensitive vegetation types exist within or around the site. The surrounding area supports typical rangeland fauna such as goats, sheep, and camels, but no wildlife of conservation concern was identified. The site is not located near any protected areas, migratory routes, or biodiversity hotspots.

4.5 Water Resources and Drainage

There are no permanent water bodies near the project site. Water for construction and clinic operations will be sourced from the existing community water supply system. The site has natural drainage that directs runoff away from the surrounding settlement areas. No flood risk was identified, and the area is not prone to seasonal water accumulation. A soak-away pit and proper drainage structures will be incorporated into the design to manage wastewater during clinic operation.

4.6 Air Quality and Noise Levels

Baseline air quality in the project area is generally good due to the absence of industries, vehicular traffic, and other pollution sources. Occasional dust is experienced during dry and windy conditions, which is typical for semi-arid pastoral areas. Noise levels are low and primarily influenced by human activity within the settlement. Construction activities will temporarily

increase dust and noise, but impacts will be limited and manageable using standard mitigation measures.

4.7 Socio-Economic Conditions

Buran District is a pastoral community where livelihoods depend mainly on livestock production, trade, and seasonal mobility. The population includes men, women, youth, and marginalized groups who rely heavily on livestock for income, food, and social status. Access to veterinary services is extremely limited, contributing to high livestock mortality from preventable diseases.

Social infrastructure in the area includes schools, water points, small shops, and a health post. Community members have expressed strong support for the clinic, noting that it will reduce travel distances and veterinary costs.

4.8 Land Ownership and Use

The project land is public land, formally allocated to the veterinary clinic through a documented land registry process. No physical or economic displacement is associated with the subproject. The land was previously unused and did not support crops, structures, or economic activities. There are no competing land claims or boundary conflicts.

4.9 Cultural Heritage

No cultural or historical sites, graves, monuments, or religious artifacts were identified within or near the project site. The area has been used as open community land for many years. Although the risk of encountering heritage items is low, chance-find procedures will be applied during excavation.

4.10 Community Health and Safety Context

Buran is a low-density settlement with households located a safe distance from the project site. No sensitive receptors such as schools or health centers are immediately adjacent to the plot. Community health risks are generally associated with limited healthcare access, unreliable water supply, and exposure to livestock-related diseases.

Potential risks during construction include dust, noise, movement of construction vehicles, and open excavations. During the operational phase, risks include improper handling of veterinary pharmaceuticals, zoonotic disease management, and clinical waste disposal. The ESMP outlines mitigation measures to address these risks.

5. Evaluation of Environmental and Social Impacts

5.1 Introduction

This section evaluates the potential environmental and social impacts associated with the Construction of the Buran Veterinary Clinic during both the construction and operational phases. The assessment considers the project's physical setting, socio-economic context, activities involved, and sensitivities identified during field observations and community consultations.

The impacts are categorized as positive or negative, direct or indirect, short-term or long-term, and are rated based on significance and the extent to which they can be avoided, minimized, or mitigated through appropriate measures.

Overall, the project is classified as Moderate Risk, with impacts that are predictable, site-specific, and manageable through the mitigation measures outlined in the ESMP.

5.2 Positive Impacts

The construction and operation of the Buran Veterinary Clinic will generate significant environmental, social, and economic benefits, including:

a. Improved Veterinary Service Delivery

- Access to professional diagnosis, treatment, and veterinary advice.
- Availability of safe and regulated medicines.
- Reduced reliance on untrained animal health practitioners.

b. Enhanced Livestock Health and Productivity

- Increased livestock survival rates.
- Reduction in disease outbreaks due to proper vaccination and treatment.
- Improved milk yield and livestock value in the market.

c. Strengthened Community Resilience

- Better coping capacity during drought and disease outbreaks.
- Early detection of animal diseases and reduced economic shock.

d. Economic Benefits for Households

- Increased income for pastoral households.
- Reduced financial losses from livestock mortality.

- Opportunities for women and youth in livestock value chain activities.

e. Employment Opportunities

- Short-term construction jobs for local workers.
- Long-term opportunities for veterinary professionals and support staff.

f. Capacity Building and Knowledge Transfer

- Community trainings on disease prevention, proper medicine use, and hygiene.
- Enhanced awareness on safe handling and disposal of veterinary products.

g. Improved Public Health

- Reduction in zoonotic disease transmission.
- Safer handling of sick animals and contaminated materials.

h. Environmentally Sustainable Energy Use

- Solar power installation reduces dependency on diesel generators.
- Lower greenhouse gas emissions and operational costs.

5.3. Negative Environmental and Social Impacts During Construction and Operation Phases

Although the project's overall impacts are positive, certain **construction and operational activities** may generate adverse effects if not properly managed. These have been categorized by project phase:

Table 3: Negative impacts

Project Phase	Potential Negative Impacts	Relevant ESS
Construction Phase	Clearance of vegetation and disturbance of soil during site preparation.	ESS1, ESS6, ESS5, ESS10, ESS8
	Soil erosion and compaction from excavation and movement of machinery.	ESS1, ESS3, ESS10, ESS8
	Generation of construction waste including debris and packaging materials.	ESS1, ESS3, ESS5, ESS8, ESS10
	Dust emissions from excavation and vehicle movement.	ESS3, ESS8
	Noise and vibration from construction machinery and trucks.	ESS4

	Occupational health and safety risks to workers during construction.	ESS2, ESS10
	Community safety risks due to open excavations and construction activities.	ESS4, ESS10, ESS8
	SEA/SH and sexual harassment risks linked to worker presence and worker–community interaction (including with vulnerable groups).	ESS2, ESS4, ESS10
	Temporary pressure on water supply for construction needs.	ESS3, ESS10
	Minor traffic disruptions from construction vehicle movement.	ESS4, ESS10
	AMR Exposure from Waste Mishandling	ESS2
Operational Phase	Generation of veterinary and medical waste (sharps, syringes, expired drugs).	ESS1, ESS3, ESS10
	Wastewater disposal risks if drainage systems are inadequate.	ESS3, ESS5,
	Risks associated with handling and storage of pharmaceuticals and disinfectants.	ESS3
	Occupational health risks to staff from zoonotic diseases and animal handling.	ESS2, ESS4, ESS10
	Community health risks if sick or aggressive animals are not properly controlled.	ESS4
	Noise and disturbance from animals brought for treatment.	ESS4
	Increased demand for water and electricity during operation.	ESS3, ESS5, ESS10
	Uncontrolled animal movement within or around the facility poses risks to community members, clinic visitors, and staff.	ESS3, ESS4
	Potential exclusion of vulnerable groups if services are not equitably accessed.	ESS10, ESS1

6. Environmental and Social Management Plan (ESMP)

The Environmental and Social Management Plan outlines the measures required to prevent, minimize, or mitigate the potential negative impacts identified in the project, while enhancing positive outcomes. The ESMP provides a framework for implementing mitigation measures, monitoring performance, defining institutional responsibilities, and strengthening capacity for effective environmental and social risk management.

6.1 ESMP Objectives

The overall objective of the ESMP is to ensure that the construction and operation of the Buran Veterinary Clinic are undertaken in an environmentally sound, socially responsible, and sustainable manner. Specifically, the ESMP aims to:

1. **Identify and implement practical mitigation measures** to address adverse environmental and social impacts during the construction and operational phases.
2. **Ensure compliance** with the World Bank Environmental and Social Framework (ESF), the FSRP Environmental and Social Management Framework (ESMF), and national environmental regulations.
3. **Promote safe and healthy working conditions** for all project workers and safeguard the health and safety of the surrounding community.
4. **Strengthen environmental and social performance** through regular monitoring, documentation, and reporting.
5. **Clarify institutional roles and responsibilities** for ESMP implementation, supervision, and enforcement.
6. **Build the capacity of project stakeholders**, including MoLAH, PCU, contractor personnel, and clinic staff, to effectively manage environmental and social risks.
7. **Ensure equitable and inclusive access** to project benefits, particularly for vulnerable groups such as women, youth, and poorer households.
8. **Support long-term sustainability** of the clinic through appropriate operational controls, waste management systems, and environmental stewardship.

6.3 Environmental and Social Mitigation and Monitoring Plan

Table 4: Environmental and Social Mitigation and Monitoring Plan

Project Phase	Impact / Risk (with Relevant ESS)	Mitigation Measures	Monitoring Indicators	Responsible Party	Timing	Cost (USD)
Construction Phase	Vegetation clearance and soil disturbance **(ESS1, ESS6, ESS8)**	Limit vegetation removal to designated footprint; rehabilitate disturbed areas after construction.	Area cleared vs. approved plan; evidence of site restoration	Contractor / Supervising Engineer	During site preparation	300
	Soil erosion and compaction **(ESS1, ESS3)**	Water exposed soils; avoid excavation during high winds; control machinery movement.	Stabilization in place; absence of visible erosion	Contractor	Throughout construction	250
	Construction waste generation **(ESS1, ESS3)**	Segregate, collect, store, and dispose of waste at approved sites; no open dumping.	Waste collection records; site cleanliness	Contractor	Continuous	400
	Dust emissions **(ESS3)**	Sprinkle water on dusty surfaces; cover stockpiles; restrict vehicle speed.	Dust levels observed; frequency of watering	Contractor	Daily	200
	Noise and vibration **(ESS4)**	Restrict noisy activities to daytime; maintain equipment.	Noise levels within acceptable limits	Contractor	Daily	150
	Worker OHS risks **(ESS2)**	Provide PPE; conduct toolbox talks; enforce safe work procedures.	PPE availability & use; accident/incident log	Contractor	Daily	600

	Community safety risks **(ESS4)**	Fence site; install warning signs; restrict unauthorized access.	Fencing intact; signage visible; no incidents	Contractor / District Authority	Throughout construction	300
	SEA/SH risks linked to worker–community interaction **(ESS2, ESS4, ESS10)**	Mandatory Worker Code of Conduct (SEA/SH/GBV/child protection), signed by all workers. SEA/SH induction + toolbox refreshers Controlled site access and no loitering/harassment. Confidential GM channels + posters and female-friendly reporting. Enforced sanctions (warning → suspension → removal/termination; immediate removal for serious cases).	% CoC signed, trainings held, posters displayed, confidential handling, disciplinary logs.	FSRP Environmental and Social Safeguards (ESS) Team	Throughout construction	500
	Water use pressure **(ESS3)**	Coordinate water use with local leaders; minimize wastage; schedule usage.	Water use tracking; no community complaints	Contractor	As needed	100
	Traffic disruptions **(ESS4)**	Use flaggers; regulate truck movement; schedule deliveries.	Traffic control in place; no incidents	Contractor	Throughout construction	150
	AMR exposure from waste	Segregate waste; safe storage; worker training.	Waste logs; PPE use;	Contractor	Weekly	500

	mishandling ESS3		training attendance.			
	Community access disruption **(ESS4, ESS10)**	Maintain access routes; provide advance notice and signage.	Routes maintained; complaints resolved.	Contractor / District Admin	Continuous	100
Operational Phase	Veterinary and medical waste **(ESS1, ESS3)**	Provide sharps containers; segregate waste; dispose through approved methods.	Sharps boxes in use; waste disposal records	Clinic Management / MoLAH	Continuous	800/year
	Wastewater disposal risks **(ESS3)**	Maintain soak-away system; prevent wastewater discharge to open land.	Soak-away functioning; no stagnant water	Clinic Management	Quarterly	200/year
	Pharmaceutical storage risks **(ESS3)**	Store drugs in locked cabinets; maintain inventory; remove expired stock safely.	Inventory updates; expired stock logs	Clinic Management	Monthly	150/year
	Staff occupational health risks **(ESS2, ESS4)**	Provide PPE; train staff on zoonoses, chemical handling, and animal restraint.	Staff training records; PPE use	Clinic Management / MoLAH	Ongoing	500/year
	Community health risks **(ESS4)**	Control animal movement; maintain hygienic environment; apply handling protocols.	Cleanliness checks; incident reports	Clinic Management	Daily	200/year
	Noise from animals **(ESS4)**	Designate waiting area; regulate treatment schedules.	Complaints log; noise observations	Clinic Management	Daily	50/year
	Increased water & energy demand **(ESS3)**	Promote efficient use; maintain solar system; repair leaks.	Utility consumption records	Clinic Management	Ongoing	100/year

	Exclusion of vulnerable groups **(ESS10)**	Ensure equitable access; conduct outreach to women and youth; transparent pricing.	Records of women/youth users	MoLAH / District Authority	Quarterly	100/year
	AMR risk in wastewater ESS3	Maintain soak-away; restrict antibiotic flushing; monitoring.	Water quality tests; functioning soak-away.	Clinic Mgmt	Quarterly	200/year
	Stakeholder engagement and disclosure (ESS10)	Conduct regular community sensitization on construction activities, risks, GM, and SEA/SH reporting channels, including female-friendly outreach.	Consultation records; gender-disaggregated attendance lists; GM posters displayed.	District Authority/PCU	Throughout construction	200/year
	GM functionality (ESS10)	Maintain accessible GM with multiple GM Channels (verbal, phone, written), clear timelines, documentation, and confidential handling of GBV/SEA/SH cases.	Updated GM log; grievance resolution timelines met.	Clinic Management / PCU	Ongoing	

6.4 ESMP Implementation Institutional Arrangement

The successful implementation of the ESMP requires coordinated actions among several institutions. The roles and responsibilities of each institution involved in the construction and operation of the Buran Veterinary Clinic are outlined below:

FSRP Project Coordination Unit (PCU – Puntland)

- Provide overall oversight and coordination of ESMP implementation.
- Ensure compliance with World Bank ESF and the FSRP Environmental and Social Management Framework.
- Integrate ESMP requirements into contractor agreements.
- Conduct regular monitoring visits and review safeguard reports.
- Prepare periodic environmental and social performance reports.

National Project Coordination Unit (NPCU – at Federal)

- Review and endorse ESMP implementation reports submitted by the Puntland SPCU and MoERCC.
- Provide technical backstopping and guidance to the state-level PIU and contractor on safeguards compliance.
- Conduct periodic monitoring missions to verify adherence to World Bank Environmental and Social Standards (ESS).
- Ensure that grievance mechanisms (GM) are functioning effectively and that SEA/SH cases are handled in line with survivor-centered protocols.
- Facilitate capacity building and knowledge sharing across state-level teams to strengthen safeguards performance.
- Lead SIA reporting to WB within required timelines and follow up on corrective actions.
- Lead all communication, submissions, and responses to the World Bank on safeguards matters.
- Prepare and submit consolidated contractor monthly report and quarterly E&S, GM, and SEA/SH reports and share with Bank team.
- Ensure ESMPs and safeguards information are publicly disclosed and accessible.

This addition makes it clear that the NPCU is not just a coordinating body but also provides oversight and quality assurance on environmental and social safeguards during both construction and operational phases.

Ministry of Livestock and Animal Husbandry (MoLAH)

- Supervise technical aspects of the veterinary clinic during operation.
- Ensure safe handling, use, and disposal of veterinary pharmaceuticals.
- Monitor environmental and social compliance during the operational phase.
- Participate in staff training on OHS, waste management, and zoonotic disease control.
- Support the clinic in maintaining proper documentation and reporting.

Ministry of Environment, Range, and Climate Change (MoERCC)

- Provide guidance on environmental compliance and regulatory requirements.
- Conduct environmental inspections where necessary.
- Ensure alignment with Puntland environmental regulations.

Buran District Administration

- Support community engagement and mobilization activities.
- Participate in local-level monitoring of ESMP implementation.
- Facilitate resolution of community-level grievances.
- Serve as a local oversight body for GM processes.

Supervising Engineer

- Monitor day-to-day construction activities for ESMP compliance.
- Verify that mitigation measures are implemented appropriately.
- Maintain site inspection records and submit compliance reports.
- Provide technical guidance to the contractor on corrective measures.

Contractor

- Implement all construction-related mitigation and safety measures.
- Provide appropriate PPE and enforce OHS procedures.
- Manage construction waste responsibly and maintain a clean site.

- Maintain documentation on safety, waste disposal, and incidents.
- Cooperate fully with safeguard monitoring teams.
- Ensure mandatory CoC signing, SEA/SH induction, and enforcement of sanctions for misconduct, with immediate site removal for serious violations and cooperation with PCU-managed confidential GM procedures.

Clinic Management

- Implement all operational phase mitigation measures.
- Ensure proper segregation, storage, and disposal of medical and veterinary waste.
- Maintain wastewater systems and ensure hygienic conditions.
- Provide PPE for staff and enforce infection prevention measures.
- Keep records on waste management, OHS, and environmental compliance.

6.5 Capacity Building Plan

Capacity building is essential to ensure that all institutions involved in the project are able to effectively implement ESMP. Training will strengthen understanding of environmental and social safeguards, improve compliance, and promote safe and sustainable operations.

Table 5: Capacity Building Plan

Training Topic	Target Group	Training Content	Responsible Institution	Cost (USD)
ESMP implementation & safeguards compliance	PCU, MoLAH, Contractor staff	ESMP requirements, monitoring, reporting, documentation	PCU Safeguards Team	1,200
OHS and safe construction practices	Contractor workers	PPE use, hazard identification, emergency response	Contractor / PCU	800
Veterinary & medical waste management	Clinic staff	Waste segregation, sharps handling, safe disposal	MoLAH	700
Zoonotic disease prevention & animal handling	Clinic staff	Infection control, animal restraint, hygiene	MoLAH	700
GBV/SEA/SH refresher training and community awareness sessions.	PCU, Clinic staff, local community groups	Code of conducts, GM Channels, incident reporting and recording, confidentiality	PCU, contactor and MoLAH	1500

6.6 ESMP Implementation Budget

The ESMP implementation budget covers all costs associated with applying mitigation measures, monitoring environmental and social performance, conducting capacity building, and operating safeguard-related systems such as the GM. The budget includes **construction phase costs**, **operational phase costs for 5 years**, and **contingencies** to address unforeseen environmental and social risks.

The budget reflects realistic estimates for the Buran Veterinary Clinic based on experience from similar FSRP-financed veterinary facilities.

Table 6: Detailed ESMP Implementation Budget

Cost Category	Description	Estimated Cost (USD)
A. Construction Phase Mitigation Costs	Includes dust suppression, site fencing, signage, PPE for workers, temporary sanitation facilities, waste segregation bins, controlled access measures, and minor vegetation restoration.	**5,600**
B. Operational Phase Mitigation Costs (Five Years)	Covers medical waste disposal containers, sharps boxes, PPE for clinic staff, cleaning and disinfectant materials, soak-away maintenance, spill kits, pharmaceutical safety materials, and periodic replacement of waste-handling tools. Estimated at **USD 2,000 per year × 5 years**.	**11,000**
C. Monitoring and Supervision	Includes site inspections by PCU and MoLAH, report preparation, monitoring tools, fuel/transport for supervisory missions, compliance audits, and support visits from MoERCC.	**6,000**
D. Capacity Building	Cost of trainings on ESMP implementation, OHS, zoonotic disease control, medical waste management, and compliance monitoring (as detailed in Section 6.3).	**4,900**
E. GM Implementation Costs	Establishing and maintaining the GM system, including grievance registers, awareness materials, hotline credit, district-level grievance committee operational support, and documentation tools.	**1,500**
		$29,000

The ESMP implementation budget is designed to cover all environmental and social management requirements during both the construction and operational phases of the Buran Veterinary Clinic. The budget ensures compliance with safeguard standards and supports safe, efficient, and sustainable project implementation.

- Construction Phase Mitigation (USD 5,500):
  Covers dust control, site fencing, safety signage, PPE for workers, waste segregation materials, and minor site restoration.
- Operational Phase Mitigation for 5 Years (USD 10,000):
  Includes costs for medical waste handling (sharps boxes, containers), PPE for clinic staff, disinfectants, spill response materials, pharmaceutical storage needs, and maintenance of soak-away and drainage systems.
- Monitoring and Supervision (USD 6,000):
  Supports periodic inspection visits by PCU, MoLAH, and MoERCC, including transport, reporting tools, and compliance audits.
- Capacity Building (USD 4,900):
  Covers training on ESMP implementation, OHS, zoonotic disease control, and veterinary waste management.
- GM Implementation (USD 1,500):
  Supports the establishment and operation of the grievance mechanism, including awareness materials and grievance registers.
- Contingency (USD 2,600):
  Allocated for unforeseen environmental or social mitigation needs.

The total ESMP budget of USD 30,500 is sufficient to ensure that the project meets environmental and social standards while maintaining safe and sustainable operations.

After FSRP completion, ESMP monitoring will be sustained through **routine supervision and facility management** led by **MoLAH** as the clinic owner/operator, including continued use of operational logs (waste, OHS incidents, trainings, and GM). **MoERCC** will continue its statutory environmental compliance inspections, with support from the **district administration** for community feedback and grievance follow-up. Routine safeguards costs (e.g., PPE, waste containers, drainage/soak-away maintenance, refresher training) will be covered through **MoLAH operational budgets and/or clinic operating resources** as part of normal service delivery.

6.7. Grievance Mechanism (GM)

A project-level Grievance Mechanism (GM) has been established to enable workers, community members, and other stakeholders to raise concerns related to the construction and operation of the Buran Veterinary Clinic. The GM is accessible, transparent, and culturally appropriate, and aligns with World Bank ESS10. Its purpose is to provide timely resolution of complaints, strengthen accountability, and maintain constructive engagement with affected communities.

Grievances may relate to construction impacts such as dust, noise, waste, labor issues, or community safety, as well as operational concerns such as medical waste handling, odors, or service access. All complaints—verbal, written, or anonymous—will be received respectfully and handled without discrimination or fear of retaliation.

Complaints may be submitted to the PCU during construction or to the Clinic Management during operation. Community leaders and a complaint box at the site will also serve as channels. Once received, grievances will be recorded in a GM register and acknowledged within 48 hours. Most cases should be resolved within 7–14 days. If unresolved, they will be escalated to the District Administration and then to the PCU Safeguards Team. As a last resort, complainants may seek redress through the formal legal system.

Information on the GM, including procedures and contact details, will be shared through community meetings and posters displayed at the construction site and clinic. A designated GM focal person will manage registration and follow-up. Sensitive cases such as SEA/SH or GBV will be handled confidentially and referred to qualified service providers using a survivor-centered approach. SEA/SH-related complaints will be managed through a confidential, survivor-centered pathway that prioritizes survivor safety, dignity, and informed consent. Information will be collected and shared only with the survivor's consent and strictly on a need-to-know basis, with appropriate data protection measures to prevent exposure, stigma, or retaliation. Survivors will be offered voluntary referral to available, qualified GBV/SEA/SH service providers. The GM will not require written evidence or detailed narratives as a condition for receiving support or progressing a case, to avoid re-traumatization and barriers to reporting. The project will also not require survivors to pursue formal justice processes; decisions on reporting and next steps will remain with the survivor, consistent with safety and confidentiality considerations. The PCU will periodically review grievance records, ensure corrective actions are implemented, and prepare summary reports to support continuous improvement of environmental and social performance.

7. Stakeholder Consultation

7.1 Introduction

Stakeholder consultation is an important component of the environmental and social assessment process and plays a key role in ensuring that project activities are transparent, participatory, and aligned with community priorities. Consultations for the Buran Veterinary Clinic were conducted during the environmental and social screening exercise, community meetings, and field assessments with local leaders and households. The consultation process followed the principles and requirements of World Bank ESS10 – Stakeholder Engagement and Information Disclosure and the Somalia FSRP Stakeholder Engagement Plan.

The consultations aimed to provide information about the proposed veterinary clinic, gather community feedback on potential environmental and social risks, and ensure that the perspectives of different groups—especially women, youth, vulnerable households, and livestock keepers—were incorporated into the planning process. Stakeholders expressed strong support for the project and emphasized the critical role of accessible veterinary services in safeguarding their livelihoods.

7.2 Objectives of Stakeholder Consultation

The key objectives of the stakeholder consultation process were to:

- Inform community members and stakeholders about the proposed construction of the Buran Veterinary Clinic.
- Gather local knowledge, concerns, and expectations related to the environmental, social, and operational aspects of the project.
- Ensure meaningful participation of all stakeholder groups, including women, youth, pastoralists, and vulnerable households.
- Identify potential risks and site-specific issues that require mitigation during project implementation.
- Strengthen community ownership and support for the project by involving them in the decision-making process.
- Meet the requirements of ESS10 by demonstrating inclusive, participatory, and documented engagement.
- Promote transparency and accountability between the project, district authorities, and affected communities.

- Establish communication channels for continuous engagement throughout construction and operation, and share the established GM with the stakeholders.

7.3 Stakeholders Consulted

A diverse range of stakeholders were engaged during the consultation process, including:

Table 7: Stakeholders Consulted During the ESMP Preparation

Participants	Total	Women	Men	Youth
Community elders and traditional leaders	4	0	4	0
Pastoral households (men and women)	5	1	3	1
Women's groups involved in livestock and dairy activities	2	2	0	0
Youth groups supporting livestock management	2	0	0	2
Livestock traders and herders	1	0	1	0
District Administration of Buran	1	0	1	0
MoLAH representatives	1	0	1	0
FSRP PCU representatives	1	0	1	0

7.4 Issues Raised During Consultations and Responses provided

Table 8: Issues Raised During Consultations and Responses provided

Stakeholder Issue Raised	Response Provided by Government / Project Management
Community emphasized urgent need for reliable veterinary services; long distances to seek treatment causing livestock losses.	District Administration and PCU confirmed full funding under FSRP and assured timely construction. The clinic will reduce travel time and improve access to veterinary services.
Concerns about improper disposal of medical/veterinary waste, especially sharps, posing	Project team explained implementation of a full veterinary waste management system including sharps boxes, segregation, fenced storage, and disposal via approved channels under MoERCC oversight.

risks to children and livestock.	
Concern about child safety around open construction areas.	Contractor and supervising engineer committed to fencing the site, installing visible warning signs, and restricting unauthorized entry.
Elders asked about community responsibilities after allocating land.	District Administration clarified the community's role is advisory; no further contributions required. Public land parcel reference DHB/001 acknowledged.
Women requested training on livestock health and safe medicine use.	MoLAH committed to including women's groups in outreach, sensitization, and training during clinic operation.
Concern about affordability of services for poor households.	PCU assured that service will be regulated, transparent, and affordable. Flexible arrangements may be considered during drought periods.
Youth requested employment opportunities.	Contractor will be ask to priority for local hiring, especially for youth in unskilled roles.
Recommendation to install solar power for vaccine storage and operations.	Project management confirmed that solar systems are included in the clinic design for refrigeration and essential operations.
Request for continued communication and consultation.	PCU reaffirmed commitment to ongoing engagement and shared GM channels for reporting concerns.

7.5 Consultation Summary

Table 9: Summary of Stakeholder Consultations

Stakeholder Group	Key Issues Raised	Community Expectation	How Feedback Was Integrated
Community elders	Need for veterinary clinic; land allocation	Strong support for project	Land registered for public use
Women's groups	Affordability of services; hygiene concerns	Desire for training and safe waste handling	Training and inclusion actions added
Youth groups	Employment opportunities; security	Participation in construction support	Contractor encouraged to hire locally
Livestock keepers	Disease outbreaks; long travel distance	Improved access to services	Clinic design and service plan adjusted
District authorities	Community safety; waste control	Support fencing and signage	ESMP includes safety and waste measures
Vulnerable groups	Cost barriers; drought impacts	Equitable access to services	ESMP includes inclusive access measures
Religious leaders	Cleanliness and public health	Support for hygiene measures	Waste and sanitation actions integrated
CAHWs & extension workers	Coordination with clinic staff	Training and involvement	Capacity building plan expanded

7.6 Integration of Stakeholder Feedback Into the ESMP

Stakeholder views were incorporated into the ESMP as follows:

- Waste management and safety concerns informed the mitigation measures for medical waste, sharps handling, and drainage.
- Community safety concerns were reflected in fencing, signage, and controlled access requirements for construction.
- Requests for inclusivity led to the development of provisions for equitable access to services by women and vulnerable groups.

- Training requests were addressed through inclusion of community sensitization and capacity building activities.
- Employment expectations resulted in recommendations for local hiring by the contractor.
- Public health concerns shaped the operational OHS and sanitation requirements.
- Access: adding targeted outreach to women, non-discriminatory service provision, and gender-disaggregated service records to track women's use of the clinic.
- Safety: strengthening site safety controls (fencing/signage) and adding SEA/SH prevention (mandatory worker Code of Conduct, SEA/SH induction, and confidential survivor-centered GM).
- Affordability: requiring transparent fee disclosure, promoting fair/consistent pricing, and using GM feedback to identify and address cost barriers for poor households (with flexibility during drought stress where feasible).

7.7 Future Community Engagement

In alignment with ESS10, the project will continue stakeholder engagement through:

- Regular community meetings during construction and operation.
- Continuous information sharing through district administrators and community leaders.
- A functional Grievance Redress Mechanism (GM) for submitting concerns or complaints.
- Public disclosure of project updates, contact persons, and GM channels at visible locations.
- Involving community members in monitoring construction progress and service quality.

The project will maintain open channels of communication to sustain community trust, support, and ownership, ensuring long-term sustainability of the veterinary clinic.

8. Conclusion

The establishment of the Buran Veterinary Clinic represents a significant and much-needed investment that will enhance livestock health services, strengthen community resilience, and improve livelihoods for pastoral households in Buran District. The environmental and social assessment undertaken for this project concludes that the proposed activities are associated with moderate, site-specific, and manageable risks that can be effectively addressed through the mitigation measures outlined in this ESMP.

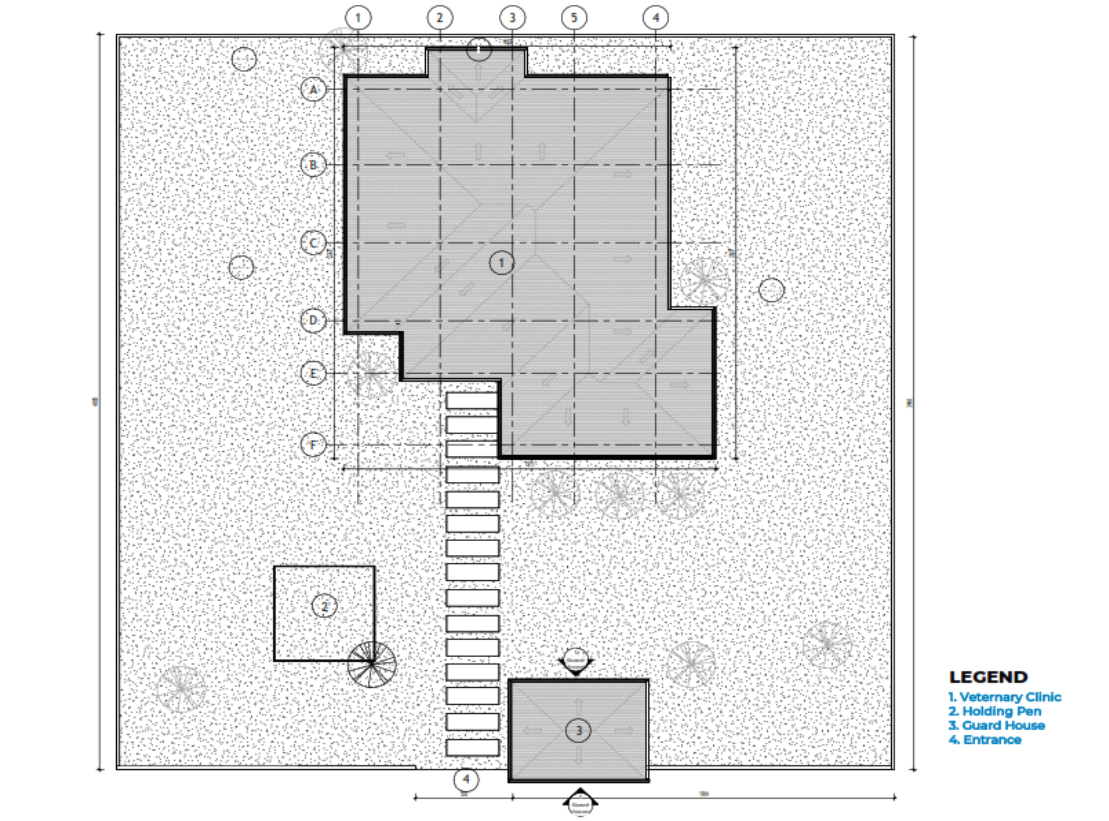
The assessment demonstrates that the community strongly supports the project, as reflected in the voluntary land donation, active participation in consultations, and clear articulation of local priorities. The clinic is expected to generate substantial long-term benefits, including reduced livestock mortality, improved disease control, increased household income, and enhanced public health through safer veterinary practices.

The Environmental and Social Management Plan provides a practical and actionable framework to manage potential impacts during both construction and operation. This includes measures for waste management, occupational health and safety, community safety, pharmaceutical handling, and inclusive service access. The ESMP further outlines monitoring requirements, institutional responsibilities, capacity building needs, and a five-year implementation budget to ensure sustained environmental and social compliance.

The project is aligned with the broader objectives of the Somalia Food Systems Resilience Project (FSRP) and adheres to the World Bank Environmental and Social Framework (ESF). With proper implementation of the ESMP, the Buran Veterinary Clinic can be constructed and operated in a manner that safeguards environmental quality, protects community health and safety, promotes social inclusion, and contributes to long-term resilience of pastoral communities in Puntland.

9. Annexes

9.1. Designs/ Layout Drawings



1 Site Plan
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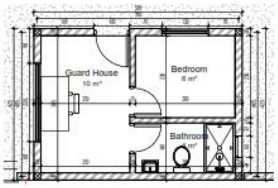
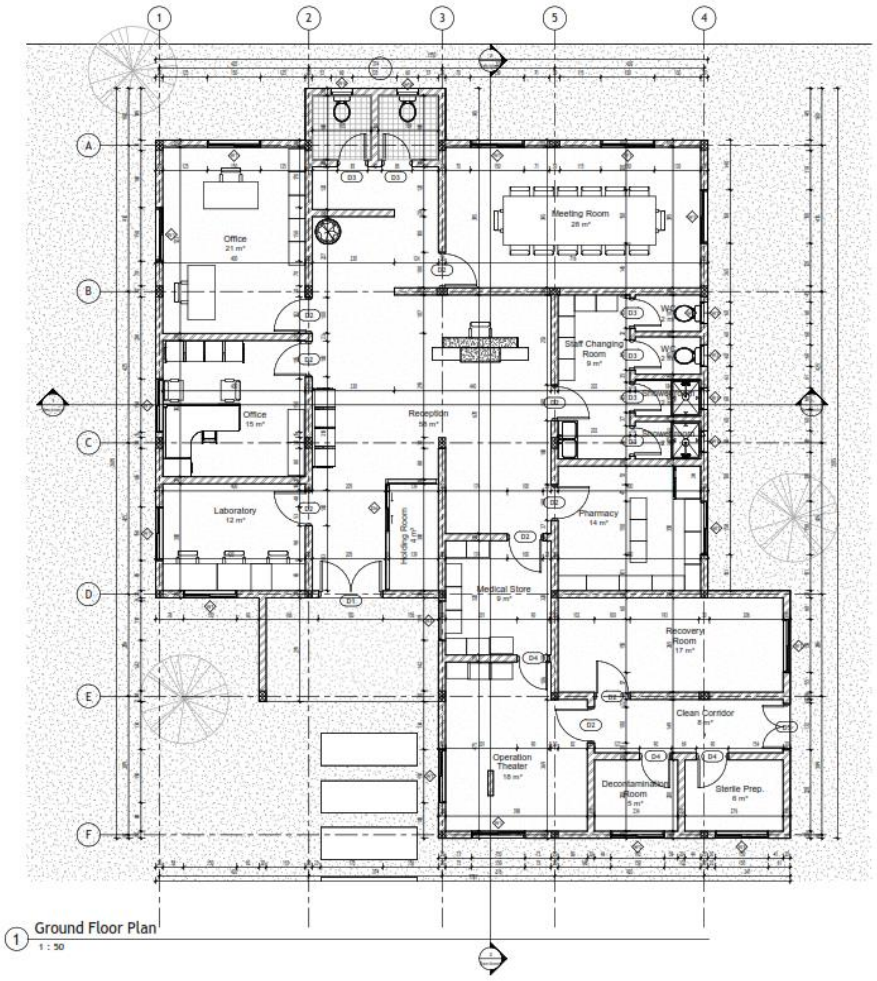




9.2. Official Confirmation of Land Ownership

DOWLADDA PUNTLAND EE SOOMAALIYEED DEGMADA BURAAN

PUNTLAND STATE OF SOMALIA BURAN DISTRICT

TIXRAAX: XGDB/42/2025 TAARIIKHDA: 9/11/2025

Local Government Land Confirmation Letter

Date: 09 November 2025

Subject: Confirmation of Government Land Allocation for the Buran Veterinary Clinics

To Whom It May Concern,

This is to formally confirm that the land identified for the Buran Veterinary Clinics subproject, located within Buran District, measuring approximately 40 meters by 40 meters (1,600 m^2), is public land under the ownership of the Buran Local Government.

The Buran Local Government has formally allocated this land for the purpose of establishing the Veterinary Clinics subproject under the Somalia Food Systems Resilience Project (S-FSRP). In Puntland State, implementation of the project is coordinated by the Project Coordination Unit (PCU) under the Ministry of Agriculture & Irrigation (MoAI), in close collaboration with the Ministry of Livestock & Animal Husbandry (MoLAH), with financial and technical support from the World Bank.

The land is free from encumbrances, disputes, or private claims, and there are no residents, assets, or livelihood activities affected by this allocation. The local government has verified that the site is unoccupied, non-productive land suitable for the planned construction.

Attached herewith are:

1. A copy of the official land ownership confirmation document issued by the Buran Local Government.

This confirmation has been issued in accordance with the World Bank Environmental and Social Framework (ESF) requirements, ensuring voluntary, transparent, and legally valid documentation of public land use for project implementation.

Eng. Jama Ahmed Abdi

Mayor of the District Buran

9.3. Land ownership documents

DOWLADDA PUNTLAND
EE SOOMAALIYEED
DEGMADA BURAAN

PUNTLAND STATE
OF SOMALIA
BURAN DISTRICT

Dowladda Hoose Ee Degmada Buraan No. 0001

MULKIYADDA DHULKA (SOBRO LOGO)

Taarikh: 25 / 11 / 2025 Tix-raac: DHB/001

Mr/Mrs: Bogcad dan-guud ah (Xarunta Xanaanada Xoolaha)

Waxa laguu ogolaaday dhulkaad soo codsatay oo cabirkiisu dhan yahay:

M/²: 40x40 m Ku Yaal Degmada: Buraan

Tuulada ama xaafada: Laanta hawada.

SOOHDIN LA LEH

Bari: Wado Waqooyi: Dul Banaan

Koonfur: Dulka danta-guud. Galbeed: Xabaalo

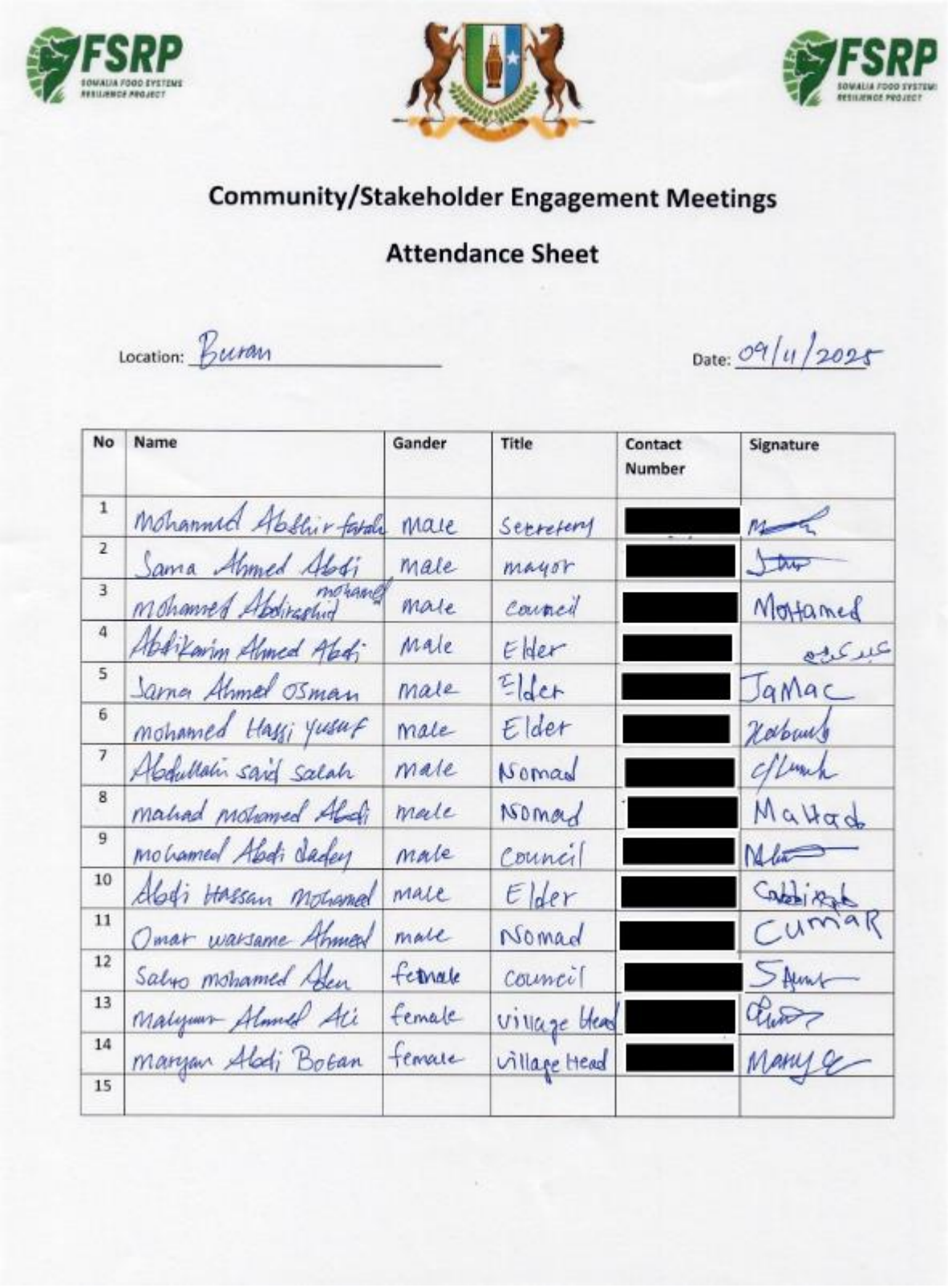
Agaasimaha waaxda H/Guud

Xaxiixa xoghayaha D/hoose

DEGMADA HOOSEE EE DEGMADA BURAAN
BURAN LOCAL GOVERNMENT

Duqa Degmada Buraan

9.4. Stakeholder Consultation meetings' participant lists



Community/Stakeholder Engagement Meetings

Attendance Sheet

Location: Buroa

Date: 09/11/2025

No	Name	Gander	Title	Contact Number	Signature
1	Mohamed Abdirashid Fatah	male	Secretery	[redacted]	
2	Sama Ahmed Abdi	male	mayor	[redacted]	
3	Mohamed Abdirashid mohamed	male	council	[redacted]	Mohamed
4	Abdikarim Ahmed Abdi	male	Elder	[redacted]	
5	Sama Ahmed Osman	male	Elder	[redacted]	JaMac
6	mohamed Hassi yusuf	male	Elder	[redacted]	
7	Abdullahi said salah	male	Nomad	[redacted]	
8	mahad mohamed Abdi	male	Nomad	[redacted]	Mahad
9	mohamed Abdi dadey	male	council	[redacted]	
10	Abdi Hassan Mohamed	male	Elder	[redacted]	
11	Omar warsame Ahmed	male	Nomad	[redacted]	CumaR
12	Salwo mohamed Aden	female	council	[redacted]	
13	Maryam Ahmed Ali	female	village Head	[redacted]	
14	Maryan Abdi Bogan	female	village Head	[redacted]	
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9.5 ES Screening Checklist

ESS Screening Form - Buran.docx

9.6. Photos for Consultation Meetings

9.7. Photos for Site Observation