SOMALIA FOOD SYSTEMS RESILIENCE PROJECT (FSRP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Activity Title:

Construction of a Veterinary Clinic in Bursalah District, Puntland

For:

Food Systems Resilience Project (FSRP) – Puntland Component

Date: February 2026

Project Coordinates:

7°11'12.0"N, 47°14'23.1"E

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LIST OF ABBREVIATIONS

Abbreviation	Meaning
CBD	Convention on Biological Diversity
CoC	Code of Conduct
Deyr	October–December rainy season
E&S	Environmental and Social
EA	Environmental Assessment
EHS	Environmental, Health, and Safety
EIA	Environmental Impact Assessment
EID	Environmental Impact Directive *(if included in template wording)*
ESAP	Environmental and Social Action Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FGS	Federal Government of Somalia
FSRP	Food Systems Resilience Project
GBV	Gender-Based Violence
GM	Grievance Mechanism
Gu	April–June rainy season
HSE	Health, Safety and Environment
IDP	Internally Displaced Person
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
OHS	Occupational Health and Safety
PCU	Project Coordination Unit
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse / 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 Environmental and Social Management Plan (ESMP) for the Construction of the Bursalah Veterinary Clinic has been prepared under the Somalia Food Systems Resilience Project (FSRP), financed by the World Bank and implemented by the Federal Government of Somalia and Puntland State. The project aims to strengthen resilience in livestock-based livelihoods by expanding access to essential veterinary services in Bursalah District, a community heavily dependent on pastoralism. This ESMP has been developed in full alignment with the FSRP Environmental and Social Management Framework (ESMF), ensuring consistency with overall project safeguards procedures, screening requirements, and mitigation standards.

The veterinary clinic will be constructed on a 40 m × 40 m community-owned plot voluntarily donated through a documented VLD process. The facility will include a fully equipped veterinary building consisting of treatment and examination areas, an operation room, pharmacy, offices, a meeting hall, medical storage, staff facilities, sanitation units, and an outdoor animal treatment area. Solar power installation and connection to the water system will ensure reliable service delivery. The clinic is expected to significantly improve livestock health, reduce animal mortality, and enhance household incomes in the district.

The ESMP identifies the environmental and social risks associated with the project as moderate and site-specific. Key risks during construction include soil disturbance, vegetation clearance, dust generation, noise, construction waste, increased traffic, and occupational health and safety (OHS) hazards. During the operational phase, risks include management of clinical and pharmaceutical waste, sanitation, zoonotic disease transmission, wastewater disposal, chemical handling, and ongoing OHS concerns for clinic staff. These risks are manageable through the mitigation and monitoring measures defined in the ESMP, which are aligned with the World Bank Environmental and Social Standards (ESS1–ESS10), the FSRP ESMF, and Puntland's EIA Act (2023).

Key risks are expected to include (i) occupational health and safety hazards during construction, (ii) infection control and healthcare/clinical waste handling during operation, and (iii) community safety risks, including traffic, dust, and interaction with nearby sensitive receptors. These risks will be managed through contractor OHS controls (PPE, toolbox talks, site access control, emergency readiness), an operational infection prevention and waste management system (segregation,

secure storage, licensed disposal/controlled burning where permitted), and community protection measures (traffic management, dust suppression, signage, and restricted work hours near schools).

Stakeholder consultations involving community elders, district authorities, livestock owners, women and youth groups confirmed strong support for the project. Stakeholders emphasized the urgent need for veterinary services, the importance of environmental safety, and concerns regarding waste disposal and site protection. Their feedback informed the site selection, design, and risk reduction strategies. A functional Grievance Mechanism (GM) is established to ensure transparent and timely resolution of complaints throughout construction and operation.

Effective ESMP implementation will require coordinated actions from the PCU, MoLAH, the contractor, supervising engineer, and Bursalah Municipality. A capacity-building plan has been included to strengthen skills in OHS, waste management, infection control, and environmental compliance. The total ESMP implementation cost over five years is estimated at USD 17,550, covering construction-phase measures, operational safeguards, and a USD 3,400 training budget.

Overall, the ESMP concludes that the Bursalah Veterinary Clinic can be constructed and operated safely, sustainably, and in full compliance with national regulations, the FSRP ESMF, and World Bank safeguards. With proper implementation, the project will deliver significant and long-lasting benefits to pastoral households, improve livestock productivity, and enhance community resilience to climate- and disease-related shocks.

2. Introduction

2.1 Project Overview

The Somalia Food Systems Resilience Project (FSRP) is a World Bank–funded initiative jointly implemented by the Federal Government of Somalia (FGS) and Federal Member States, including Puntland State of Somalia. The project seeks to strengthen the resilience of Somalia's food systems to climate shocks through climate-smart investments in agriculture, livestock, water management, and market infrastructure.

FSRP supports national and sub-national efforts to improve agricultural productivity, market access, and sustainable management of natural resources while addressing vulnerabilities caused by drought, land degradation, and weak value chains. The project aligns with Somalia's long-term vision of achieving food security and economic stability through sustainable and inclusive development.

The project's design draws from lessons learned in previous resilience and drought recovery programs in the Horn of Africa and aims to promote climate-resilient production systems, improved market integration, and institutional coordination between key sectors.

In Puntland, and under Component 2—Building Resilient Market and Value Chain Infrastructure—the project is supporting the **Construction of a Veterinary Clinic in Bursalah District**, Mudug Region. The facility will provide essential veterinary services including diagnosis, treatment, minor surgery, vaccination, and community awareness on livestock health. As Bursalah is a livestock-dependent community, the clinic will play a central role in improving animal health, strengthening disease control, reducing livestock mortality, and enhancing the livelihoods of pastoral and agro-pastoral households.

The facility will be built on a community-owned 40 m × 40 m plot voluntarily donated through a formal VLD process. The clinic is expected to improve service delivery, reduce economic losses due to animal disease, and contribute to climate-resilient and sustainable livestock management practices.

2.2 Purpose of the Environmental and Social Management Plan (ESMP)

The purpose of this Environmental and Social Management Plan (ESMP) is to identify, evaluate, and manage the environmental and social risks associated with the construction and operation of the Bursalah Veterinary Clinic. The ESMP ensures compliance with the World Bank Environmental and Social Framework (ESF)—particularly the Environmental and Social Standards

(ESS1–ESS10)—and with Puntland State environmental legislation, including the Environmental Impact Assessment Act (2023).

This ESMP serves as a guiding instrument for implementing entities, contractors, supervisory personnel, and relevant government agencies to:

- Minimize adverse environmental and social impacts during construction and operation;
- Promote safe, healthy, and inclusive working conditions;
- Ensure systematic monitoring and reporting of environmental and social performance;
- Establish clear institutional responsibilities for ESMP implementation;
- Enhance community engagement and provide accessible grievance redress mechanisms;
- Reinforce sustainable operational practices, including waste management, safe animal handling, and energy efficiency.

2.3 Scope of the ESMP

This ESMP applies to all phases of the Bursalah Veterinary Clinic development, including:

- Site preparation, clearance, and demolition of the small unused structure currently on the land;
- Construction of the perimeter fence, clinic buildings, sanitation facilities, and outdoor treatment areas;
- Installation of solar power systems and connection to water supply;
- Management of environmental risks such as dust, noise, waste, vegetation clearance, and drainage during construction;
- Occupational health and safety measures for workers and visitors;
- Operational-phase risks including medical waste management, sanitation, infection control, water use, and community health and safety;
- Stakeholder engagement, consultations, and GM mechanisms;
- Monitoring, compliance, and institutional arrangements for long-term operation.

The ESMP is informed by field observations, technical assessments, community consultations, and environmental and social screening findings.

2.4 Methodology

The preparation of this ESMP followed a structured methodology aligned with the S-FSRP Environmental and Social Management Framework (ESMF), the World Bank ESF, and the Puntland EIA Act (2023). The following approaches were used:

a. Field Observations and Site Assessments

A technical team conducted site visits to assess topography, soil stability, drainage, vegetation, accessibility, and the proximity of sensitive receptors such as two nearby schools located at 60 m and 200 m from the project site respectively. GPS coordinates, photos, and measurements of the 40 m × 40 m plot were recorded.

b. Desktop Review

A review of relevant documents, including:

- Project design and layout
- Bursalah Project Description document
- World Bank ESS1–ESS10
- Puntland environmental and labor legislation
- Desktop review also included site tenure documentation like VLD documentation and land ownership certificates, See **Annex 9.1.1: Land Registration Certificate** and **Annex 9.1.2: VLD Consent Form**.

c. Environmental & Social Screening

The S-FSRP screening checklist was applied to determine risk levels, ESS applicability, and required mitigation measures. The project was classified as **Moderate Risk**, considering potential impacts on vegetation, waste generation, OHS, and nearby sensitive receptors.

d. Stakeholder Consultations

Meetings with the Bursalah Mayor, MoLAH officials, livestock traders, women's groups, and elders were conducted to:

- Validate land donation
- Identify community priorities
- Discuss environmental and social risks

- Share information on GM (FSRP Hotline 3060)

2.5 Project Activity Description

The proposed Veterinary Clinic in Bursalah aims to strengthen animal health services, improve disease control, and support livestock productivity in the region. The facility is designed to provide essential veterinary care, diagnosis, and treatment services in a safe, hygienic, and climate-resilient environment. The project will be developed within a 40 m × 40 m fenced compound to ensure security and controlled access.

Key project components include:

- **Boundary Wall (40 m × 40 m):**
  A reinforced perimeter wall will be constructed to secure the site, prevent unauthorized access, and define the clinic boundaries. The wall will include a main gate and pedestrian access for staff and clients.
- **Main Veterinary Building:**
  The central structure will be a fully equipped facility designed to accommodate essential veterinary functions. It will consist of:
    - **Operation Theatre:** For minor surgical procedures and emergency animal treatments.
    - **Pharmacy:** For storage and controlled dispensing of veterinary medicines and supplies.
    - **Two Offices:** To accommodate veterinary officers, administrative staff, and client record management.
    - **Medical Store:** For storage of drugs, vaccines, and consumable medical materials under proper temperature and hygiene conditions.
    - **Staff Room:** To serve as a resting and preparation area for clinic personnel.
    - **Meeting Hall:** For staff meetings, training sessions, and community awareness programs on animal health and disease prevention.
    - **Toilets:** Gender-segregated sanitation facilities for staff and clients.
- **Animal Treatment Area:**
  A designated outdoor section equipped with shade, pens, and troughs for handling,

examination, and treatment of animals. The area will be designed for easy cleaning and drainage to maintain hygiene and minimize disease transmission.

- **Solarization:**
  Installation of a solar photovoltaic (PV) system to provide reliable and renewable power for lighting, refrigeration (for vaccines and medicines), and essential clinic operations, reducing dependence on the national grid or diesel generators.
- **Land Development and Plantation:**
  The site will undergo grading and minor landscaping to ensure proper drainage and minimize erosion.

Bursalah Veterinary Clinic – Workforce Composition

The construction and early operation of the Bursalah Veterinary Clinic will engage an estimated **60 workers** during peak periods. The workforce composition is as follows:

- **Total workers:** 60
- **Skilled workers:** 22
- **Unskilled workers:** 35
- **Engineers and site management team:** 3

In terms of origin:

- **Local community workers:** 18 (mainly unskilled and semi-skilled labor)
- **Workers from outside the project area:** 3 (engineers and site management staff only)

The project will prioritize recruitment from the local community, particularly for unskilled and semi-skilled positions, to minimize labor influx and associated social risks, including GBV/SEA/SH, in line with ESS2 and ESS10.

2.5.1 Technical Design & Layout

The Bursalah Veterinary Clinic will be constructed within a 40m × 40m secured compound to ensure proper site organization and controlled access. The design complies with applicable Puntland building code provisions, veterinary infection-control layout principles, and basic fire safety standards, including provision of at least two emergency exit points. The layout also reflects climate-adaptive considerations suitable for the semi-arid conditions of the area.

The facility incorporates universal accessibility features, including concrete access ramps with a maximum slope of 1:12 at main entrances, ensuring safe and inclusive access for persons with disabilities and individuals with limited mobility.

Beyond the solar PV system, additional climate-resilient features include cross-ventilation windows to enhance natural airflow, roof overhangs of at least 600 mm for shading, and light-colored exterior finishes to reduce heat absorption and improve indoor thermal comfort.

2.5.2 Utilities & Resource Use

The clinic's sanitation and drainage system will consist of a septic tank with a minimum capacity of 15 m^3 connected to a soak-away pit with gravel filtration to ensure safe wastewater disposal. Separate drainage provisions will be made for animal effluent where applicable to prevent contamination. The site will be properly graded to avoid water stagnation, and roof gutters with defined stormwater discharge points will be installed to manage runoff effectively.

To safeguard vaccines and temperature-sensitive medicines, the facility will be equipped with a medical-grade refrigerator operating within the 2–8°C range. The cold chain system will be supported by a battery-backed solar power system providing a minimum of 8–12 hours of backup autonomy. A temperature monitoring log system and lockable storage will be maintained to ensure proper control and compliance with vaccine storage standards.

2.5.3 Construction Methodology & Temporary Works

Construction of the Bursalah Veterinary Clinic will follow a structured sequence beginning with site clearing and leveling, followed by foundation works, structural construction, roofing and finishing works, MEP installation, and finally external works including fencing and landscaping. This phased approach ensures orderly implementation and quality control at each stage.

Construction materials such as sand, aggregates, and concrete blocks will be procured from local suppliers to ensure quality and regulatory compliance. Approved haul routes will be used to minimize traffic disruption, reduce dust generation, and limit disturbance to surrounding communities.

Temporary facilities will include a designated construction yard, secured material storage area, worker sanitation facilities (temporary toilets), a water storage tank, and temporary generator power to support site operations.

From a labor management perspective, standard working hours will be from 7:00 AM to 4:00 PM. Weekly toolbox safety meetings will be conducted, and mandatory PPE including helmets, safety

boots, gloves, and reflective vests will be enforced. Occupational Health and Safety (OHS) compliance will be supervised by the site engineer in line with the project's requirements.

2.5.4 Traffic, Access, Functional Zoning, Safety & Waste Management

During the **construction phase**, site access will be controlled through a designated entry and exit point to regulate movement of vehicles and materials. Speed limit signage will be installed within and around the site, and traffic marshals will be deployed during material delivery to ensure safety and minimize disruption to the surrounding community.

In terms of **functional zoning and infection prevention**, the facility will incorporate animal handling infrastructure such as steel restraint frames to ensure safe examination and treatment. Biosecurity measures will include footbaths at key entry points, controlled access to the pharmacy and medical store, and use of separate color-coded waste bins to prevent cross-contamination.

For **fire, life-safety, and emergency preparedness**, the building design complies with basic fire safety standards, including provision of at least two emergency exit points and clearly marked escape routes. An external assembly point will be identified, and regular emergency drills will be conducted during operation to ensure preparedness.

Regarding **waste streams and management**, the clinic will generate veterinary medical waste (e.g., needles and syringes), pharmaceutical waste, animal biological waste, domestic waste, and construction waste during the building phase. Waste management measures will include use of sharps containers, temporary secure storage areas, approved disposal methods, waste segregation through color-coded bins, and regular collection by authorized service providers to ensure environmental and public health protection.

3. Policy, Legal, and Administrative Framework

3.1 Introduction

This section outlines the national policies, legal instruments, institutional mandates, and international frameworks relevant to the environmental and social management of the **Construction of Bursalah Veterinary Clinic**. The project must comply with Puntland State regulations, Federal Government policies, and the World Bank Environmental and Social Framework (ESF). The objective is to ensure that all project activities are implemented in an environmentally responsible, socially inclusive, and legally compliant manner.

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 Bursalah 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 the contractors on Labor Management Procedures (LMP) to all project workers including prohibition of child and forced labor, non-discrimination, OHS provisions, worker's rights and a dedicated Worker's GM separate from the community GM.

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.

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)

Responsible for:

- Monitoring environmental compliance;
- Enforcing EIA Act provisions;
- Inspecting waste management, vegetation clearance, and drainage systems.

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. Bursalah 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 ESS2, ESS3, ESS4, and ESS10 requirements.
- prepare and implement a Contractor's Environmental and Social Management Plan (C-ESMP) including OHS, waste management, traffic management, emergency preparedness and response, Workers' Code of Conduct, SEA/SH mitigation measures, and a Workers' GM.

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 Bursalah 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	; project uses voluntary land donation (VLD).
ESS6	Biodiversity Conservation	Minor vegetation removal requires responsible site clearance.
ESS8	Cultural Heritage	Chance-find procedures apply during excavation.
ESS10	Stakeholder Engagement and Information Disclosure	Mandatory consultations and GM integration throughout the project.

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

This section summarizes the key institutions involved in ensuring compliance and coordination for planning, construction, and operation of the Bursalah Veterinary Clinic, including their mandates, responsibilities, and reporting/coordination lines.

Table 2 Institutional Roles and Responsibilities for ESMP Compliance

Institution / Actor	Mandate / Role	Key Responsibilities for ESMP Compliance	Coordination / Reporting Line
MoLAH (District/Veterinary Authorities)	Lead technical owner/operator for veterinary services	Oversees service delivery requirements; supports operational biosecurity and animal welfare; ensures clinic procedures (inspection, hygiene, waste handling) are implemented; participates in monitoring and corrective actions	Coordinates with Municipality, PCU, MoERCC; reports operational issues through clinic management and district structures

Municipality / District Administration	Local authority; permitting and local oversight	Confirms local approvals and land documentation; supports enforcement of local bylaws (waste, sanitation, access control); supports community engagement and issue resolution	Coordinates with MoLAH and PCU; links to local security and community leaders as needed
MoERCC (Environmental Authority)	Environmental oversight and compliance	Provides guidance on environmental compliance; reviews/endorses mitigation measures; supports monitoring and site inspections as needed; advises on waste management and pollution prevention	Coordinates with PCU safeguards and District Administration; receives incident/non-compliance notifications when required
PCU / Project Implementing Unit (Safeguards Team)	ESF oversight for the subproject	Ensures ESMP implementation; reviews contractor C-ESMP; monitors compliance, including labor, OHS, stakeholder engagement, and GM; supports reporting, incident management, and corrective action follow-up	Reports to implementing agency/project management; coordinates with MoLAH, MoERCC, Municipality, Supervising Engineer
Supervising Engineer (SE)	Day-to-day construction supervision	Confirms contractor compliance with ESMP/C-ESMP; verifies implementation of OHS, waste, traffic management, and community safety measures; documents non-compliances and instructs corrective actions	Reports to PCU and implementing agency; coordinates daily with Contractor and clinic focal points

Contractor	Executes civil works	Implements C-ESMP, OHS plan, waste management, traffic/access controls, dust/noise control, worker code of conduct, SEA/SH prevention measures, and community safety actions; keeps records (trainings, incidents, inspections)	Reports to Supervising Engineer; provides monthly ES reports; notifies incidents immediately
Clinic Management / Facility In-Charge (Operational phase)	Responsible for clinic operations and day-to-day management	Implements operational procedures: infection prevention, hygiene, waste segregation and secure storage, PPE use, emergency readiness; maintains records; handles complaints through GM	Coordinates with MoLAH, Municipality, and PCU; escalates incidents and serious complaints
Community Representatives (Elders, Women, Youth)	Community interface and feedback channel	Supports awareness and feedback; helps identify community concerns (access, safety, noise/dust); supports dispute resolution at community level; promotes use of GM	Coordinates with Municipality/MoLAH; channels issues to GM focal point for formal registration

4. Project Area Description

4.1 General Location

The proposed Veterinary Clinic will be constructed in **Halgan Village**, located within **Bursalah District**, Mudug Region, Puntland State of Somalia. Bursalah is one of the key livestock-rearing communities in Puntland, where pastoralism and livestock trade form the backbone of household livelihoods. The community relies heavily on camels, goats, sheep, and cattle for income, nutrition, and social resilience.

The project site is a **40 m × 40 m** land parcel situated within the settlement boundary. It lies approximately **400 meters from the main tarmac road** and is accessible via an existing gravel road that allows movement of light and medium vehicles. The site is strategically positioned to support easy access for livestock owners seeking veterinary services.

GPS coordinates recorded during the field assessment are: **7°11'12.0"N, 47°14'23.1"E.**

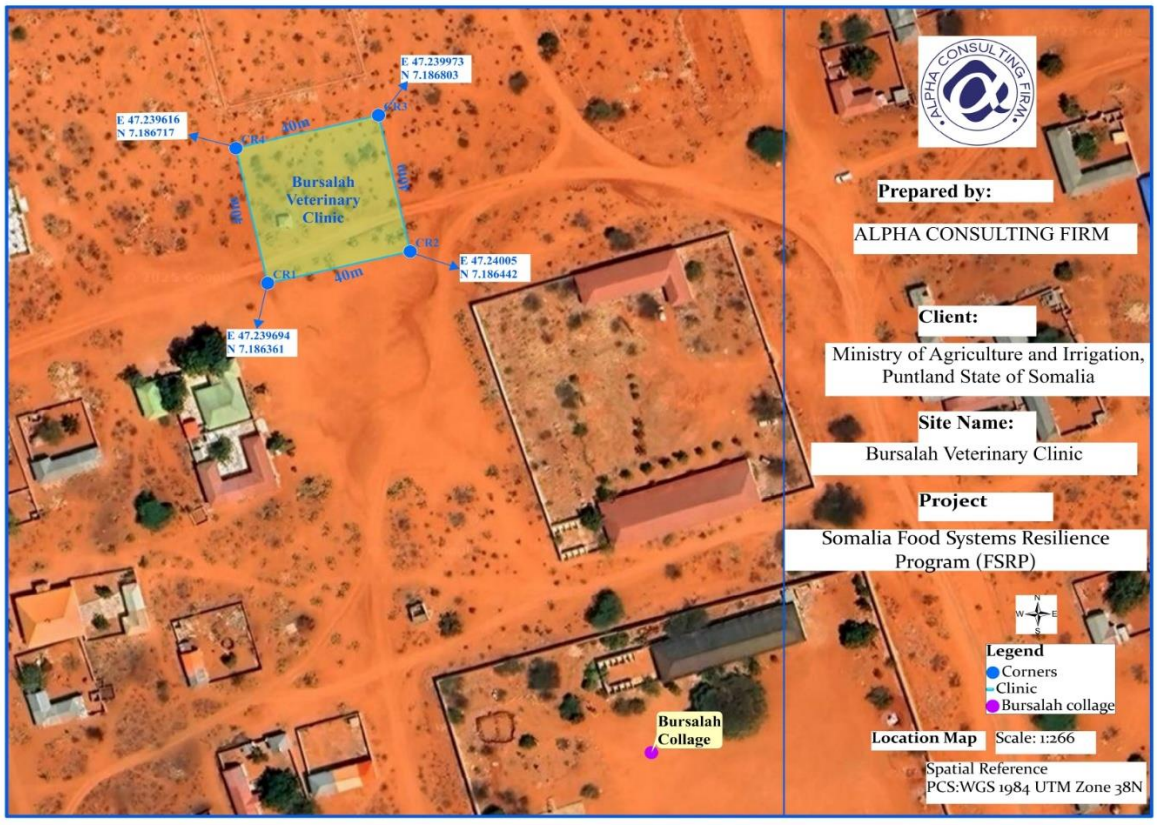


Figure 1: Bursalah Vet clinic site map

4.2 Land Ownership and Tenure

The land designated for the veterinary clinic is **community-owned** and was donated voluntarily through a transparent and inclusive process. Community leaders, elders, women representatives, and youth accepted the assignment of the land to the project without compensation. Municipal authorities verified ownership, and all necessary documentation supporting the voluntary land donation was completed.

The community confirmed that:

- The land is free of disputes;
- No physical or economic displacement will occur;
- The donation was made willingly for public benefit;
- The veterinary clinic is viewed as a priority investment for improving animal health services.

Land ownership and tenure have been confirmed through the **Land Registration Certificate (Annex 9.1.1)**. The voluntary land donation process is documented through the **VLD Consent Form (Annex 9.1.2)**, confirming that the land was provided voluntarily without coercion and without triggering land acquisition or displacement impacts

4.3 Accessibility and Infrastructure

Access Roads

The project site is connected to the main road by a natural gravel road extending approximately 400 meters. The road is generally passable under normal weather conditions but may become challenging during heavy rains.

Water Supply

A piped water system runs approximately 10 meters from the clinic boundary, permitting simple connection to the facility's internal water installations.

Electricity

The area is served by a local electricity distribution system located about 50 meters from the site. However, the project includes a solar system to ensure uninterrupted and sustainable power supply.

Communication and Internet

Mobile network coverage in Bursalah is reliable, and internet availability is adequate to support future clinic operations, record-keeping, and communication.

Nearby Social Services

The nearest health facility is located approximately 1.5 km from the project site, enabling health coordination when required.

4.4 Physical and Biophysical Environment

4.4 Physical and Biophysical Environment

4.4.1 Climate and meteorology

The Bursalah area has an arid to semi-arid climate with highly variable rainfall. Rainfall is generally low and occurs in short, sometimes intense events during seasonal rainy periods, while prolonged dry spells are common. Temperatures remain high for much of the year with strong solar radiation, creating heat-stress conditions for people and animals. Humidity is typically low, rising briefly after rainfall. Seasonal winds can be strong and dusty, increasing windblown dust, influencing odor dispersion, and raising the need for dust control during construction and good waste management during operation.

4.4.2 Topography and landform

The project area is predominantly flat to gently undulating rangeland terrain. Slopes are generally limited; however, localized depressions and minor drainage pathways may concentrate runoff during heavy rains. This setting requires careful site grading to prevent ponding and to direct stormwater away from buildings, work areas, and neighboring plots.

4.4.3 Geology and soil characteristics

Soils are commonly sandy to sandy-loam with variable compaction, particularly near settlements and tracks. Such soils are vulnerable to surface erosion when disturbed and to dust generation during dry periods. With appropriate foundation design, compaction, and drainage, ground conditions are generally suitable for the proposed light-to-moderate civil works. Construction material sourcing should be managed to avoid informal borrow pits and erosion scars.

4.4.4 Hydrology and water resources

Surface water resources are limited and mainly seasonal. Runoff typically occurs during rain events and flows through ephemeral drainage lines, with localized flooding risk in low-lying areas

where drainage is obstructed. Groundwater may be accessed through boreholes or shallow wells, but yield and quality can vary seasonally and by location. Reliable water supply for the clinic is essential for hygiene, cleaning, and animal handling; therefore, the design should incorporate storage and water-use controls to maintain service continuity during peak demand and dry periods.

4.4.5 Ambient air quality

Ambient air quality is generally good due to the absence of major industrial sources, but dust can be elevated, especially in the dry season and during windy periods. Primary dust sources include unpaved roads, vehicle movement, livestock movement, and exposed soils. Construction activities can temporarily increase dust if not controlled. During operation, localized odors or minor emissions may occur if wastes and wastewater are poorly managed.

4.4.6 Baseline noise environment

Baseline noise levels reflect a rural/settlement setting, with intermittent noise from road traffic, community activities, livestock movement, and occasional generator or solar equipment. Construction will temporarily raise noise levels due to machinery and transport activities, while operational noise may include animal handling and routine clinic activities. Noise management should include appropriate working hours, equipment maintenance, and avoidance of unnecessary idling near sensitive receptors.

4.4.7 Water quality (baseline considerations)

Water quality may vary across sources. Groundwater can have elevated salinity and hardness and may also present microbial contamination risks where wells are unprotected or where sanitation is inadequate. Where the clinic relies on well/borehole supply, basic screening for key parameters (physical clarity/turbidity, salinity indicators, and microbial contamination risk) is recommended to ensure suitability for clinic use. Wastewater from washing and clinic functions should be managed to prevent stagnant pools, odors, and contamination pathways.

4.4.8 Land use and land cover

The surrounding land is primarily rangeland used for grazing, with scattered settlements, footpaths, and tracks. Vegetation cover is generally sparse to moderate and composed of drought-tolerant shrubs and seasonal grasses. Land pressures may increase near settlements due to livestock concentration and biomass harvesting. The clinic plot is within a human-influenced environment and is not expected to require significant vegetation clearance; however, unnecessary clearing should be avoided to reduce erosion and dust.

4.4.9 Natural hazards

The area is exposed to recurrent drought and water scarcity, which can intensify livestock stress, increase movements, and raise demand for veterinary services. Flash flooding can occur during intense rainfall events, especially where drainage is poor. Strong winds can increase dust levels and may affect lightweight structures and construction activities. These hazards should inform drainage design, water storage planning, heat management measures, and emergency preparedness.

4.4.10 Biological environment (flora, fauna, biodiversity)

Vegetation in the area is typical of dry rangeland ecosystems, consisting of shrubs, scattered trees, and seasonal grasses, with density fluctuating by season. Wildlife presence near settlements is generally limited but may include small mammals, reptiles, and common bird species. No critical habitats are expected at the clinic plot scale, and the overall biodiversity sensitivity is considered low. Good practice measures should still be applied, including minimizing vegetation disturbance, preventing open dumping, and maintaining clean site conditions to avoid attracting scavengers or nuisance species.

4.4.11 Implications for ES risk screening and ESMP planning

Baseline conditions indicate key sensitivities related to dust and windblown materials, stormwater runoff and localized pooling, variability in water availability and quality, and risks associated with wastewater and clinical/veterinary waste handling. ESMP priorities should therefore include strong dust and erosion control during construction, effective grading and drainage, reliable water supply and storage, safe sanitation and wastewater management, and secure segregation and storage of veterinary/clinical wastes.

4.5 Socio-Economic Environment

4.5.1 Pastoral and grazing patterns

Livelihoods in the Bursalah area are strongly shaped by pastoralism and agro-pastoral activities. Households commonly manage mixed herds dominated by small ruminants and camels, with cattle typically present in smaller numbers depending on local conditions. Grazing patterns are seasonal and influenced by rainfall variability, with movement to access pasture and water. During drought periods, mobility increases and livestock may concentrate near settlements and water points, intensifying pressure on rangelands and increasing the importance of accessible veterinary services.

4.5.2 Water use and accessibility

Domestic and livestock water needs are mainly met through boreholes, shallow wells, and community water points where available. Seasonal runoff in depressions and ephemeral channels may be used temporarily after rains but is often short-lived and may have water quality concerns. Access can be constrained by distance, pumping reliability, seasonal fluctuations, and cost, particularly during dry months. Reliable clinic water access is critical for hygiene, cleaning, and animal handling, and should be supported by storage and controlled use to reduce operational disruptions.

4.5.3 Natural resource dependence

Communities depend on local natural resources for daily needs, including fuelwood for cooking, some charcoal use, and local building materials such as sand, stone, and poles for basic construction and fencing. During prolonged dry periods, reliance on woody vegetation may increase due to limited alternatives, contributing to localized degradation. Construction sourcing and operations should avoid encouraging unsustainable extraction and should prevent informal borrow pits and uncontrolled vegetation cutting.

4.5.4 Community infrastructure and services

Transport infrastructure typically consists of gravel or earth roads linking settlements to district centers, with footpaths connecting neighborhoods, water points, and grazing areas. Road conditions may worsen during rains, while dry-season dust affects nearby receptors. Local economic services include small shops and trading points, with livestock-related activities providing income for herders, traders, and transporters. Water and sanitation services are generally basic, and waste handling systems are limited. Energy access may be constrained and unreliable; solar systems are increasingly used for lighting and basic power, while biomass remains common for cooking. Mobile phone coverage is typically available but may vary in strength; internet access is often limited, which can affect communication and service coordination.

4.5.5 Cultural and heritage aspects

No cultural heritage sites are expected within the clinic footprint; however, communities may have culturally significant places in the wider area, including graves, sacred trees, or traditional meeting locations. Traditional leadership and customary norms strongly influence decision-making, dispute resolution, and community mobilization. A chance-find procedure should be applied during excavation works to safeguard any unexpected cultural materials or sites.

4.5.6 Security and governance

Local administration is typically led by district authorities working alongside customary leaders, elders, and community committees. These structures play an important role in local coordination, dispute resolution, and communication of public activities. Local tensions can arise around access to water and grazing, land boundaries, and seasonal livestock movements, especially during drought. The project should manage these risks through transparent information sharing, clear site management rules, inclusive engagement, and a functioning grievance mechanism.

4.5.7 Stakeholders and community engagement

Key stakeholders include livestock owners and herders, veterinary staff and para-vets, women and youth engaged in livestock-related trade, transporters, nearby households, district/municipal authorities, customary leaders, and local community groups. Community priorities typically include reliable and affordable veterinary services, disease prevention, and safe and hygienic clinic operations. Common concerns may relate to construction dust and noise, traffic and pedestrian safety, waste and wastewater management, security around the facility, and clarity on how complaints are received and addressed. These priorities are addressed through stakeholder engagement measures, accessible feedback channels, and the project's grievance mechanism.

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 Bursalah 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 Bursalah 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 Environmental and Social Impacts

Impact Category	**Description of Impact**	**Phase**	**Relevant ESS**
Soil Disturbance & Erosion	Excavation, leveling, and backfilling may disturb soil and cause erosion.	Construction	ESS1
Vegetation Clearance	Removal of shrubs and grasses within the site boundary.	Construction	ESS6
Construction Waste Generation	Soil, stones, packaging, scrap metal, limited hazardous waste.	Construction	ESS3
Dust Emissions	Dust from machinery and earthworks affecting nearby households and schools.	Construction	ESS3; ESS4
Air Pollution from Machinery	Emissions from trucks and equipment.	Construction	ESS3
Noise and Vibration	Disturbance to nearby communities and schools.	Construction	ESS4
Occupational Health & Safety (OHS) Risks	Injuries from tools, equipment, heat exposure, falls.	Construction	ESS2
Community Health & Safety Risks	Unauthorized access, dust, noise, traffic hazards.	Construction	ESS4
Potential SEA/SH Risks	risks related to worker–community interaction may still occur if not properly managed.		(ESS2, ESS10)
Traffic and Road Safety Risks	Increased vehicle movement affecting pedestrians and livestock.	Construction	ESS4
Chance-Find Cultural Heritage	Potential discovery of cultural or historical artifacts.	Construction	ESS8

Medical & Pharmaceutical Waste	Sharps, expired medicines, contaminated materials.	Operation	ESS3; ESS4
Odor and Sanitation Issues	Poor waste handling may cause unhygienic conditions.	Operation	ESS4
Infectious Disease Transmission Risks	Risk of zoonotic diseases from animal handling.	Operation	ESS4
Water Use and Wastewater Mismanagement	Increased water demand and potential contamination.	Operation	ESS3
Solid Waste Generation	General waste from clinic activities.	Operation	ESS3
Traffic and Animal Movement	Congestion due to livestock and client movement.	Operation	ESS4
Occupational Health & Safety Risks for Staff	Exposure to infected animals, chemicals, and medicines.	Operation	ESS2
Fire and Electrical Hazards	Risks from solar equipment or electrical faults.	Operation	ESS4
Chemical Handling Risks	Risks associated with disinfectants, medicines, and cleaning agents.	Operation	ESS3; ESS2

6. Environmental and Social Management Plan (ESMP)

6.1 Overview of Key Environmental and Social Risks and Impacts

The construction and operationalization of the Bursalah Veterinary Clinic will generate a range of environmental and social risks that require careful management. The key risks identified include soil disturbance, vegetation clearance, dust emissions, noise, construction waste generation, hazardous materials handling, occupational health and safety risks, community health and safety concerns, and medical/pharmaceutical waste management during operation.

These risks are generally predictable, site-specific, and manageable through the application of standard mitigation measures. Positive impacts include improved veterinary service delivery, enhanced livestock health, strengthened household resilience, employment creation, and improved public health through controlled disease management. The ESMP provides a systematic framework to ensure that potential negative impacts are avoided, minimized or mitigated while maximizing project benefits.

6.2 Objectives of the Environmental and Social Management Plan

The purpose of the ESMP is to:

- Ensure that environmental and social risks identified during screening and assessment are effectively mitigated, monitored, and managed throughout the project cycle.
- Provide clear roles, responsibilities, timelines, and resources for implementing mitigation measures.
- Ensure compliance with national environmental regulations and the World Bank Environmental and Social Standards (ESS1–ESS10).
- Promote safe construction practices and safeguard workers, nearby communities, and service users.
- Strengthen environmental and social performance of the veterinary clinic during both construction and operation.

6.3. Mitigation and Monitoring Plan

Table 4: ESMP

Construction Phase					
Impact / Risk (ESS)	**Mitigation Measure**	**Responsible Party**	**Monitoring Indicator**	**Timing**	**Cost (USD)**
Soil disturbance & erosion – **ESS1**	Restrict excavation to approved areas; stabilize loose soils immediately; install temporary drainage to prevent runoff.	Contractor; Supervisor	Stable ground; no runoff or erosion observed	During earthworks	500
Vegetation clearance – **ESS6**	Confine clearing strictly within surveyed boundaries and preserve vegetation outside the footprint.	Contractor	Clearing limited to marked areas	Site preparation	150
Construction waste – **ESS3**	Implement a waste management plan with segregation, safe storage of hazardous waste, and scheduled municipal disposal.	Contractor; Municipality	Waste records; clean site; proper storage	Weekly	300
Dust emissions – **ESS3/ESS4**	Water roads/earthworks twice daily; cover haulage trucks; enforce 20 km/h limit.	Contractor	Low dust levels; no complaints received	Daily	400
Noise & vibration – **ESS4**	Restrict noisy work to 7:00–17:00; maintain machinery to reduce noise.	Contractor	Acceptable noise levels; no community complaints	Daily	0
Air emissions – **ESS3**	Maintain machinery regularly and prohibit unnecessary idling.	Contractor	No visible excessive emissions	Weekly	0
Worker OHS risks – **ESS2**	Provide full PPE; enforce daily toolbox meetings; maintain first-aid kits; train workers in safe procedures.	Contractor; Supervisor	PPE usage; incident log; toolbox attendance	Daily	1,000
Worker misconduct, GBV/SEA/SH risks (ESS2, ESS4, ESS10)	Enforce Code of Conduct signed by all workers, conduct SEA/SH induction.	Contractor	Signed CoCs,number of workers trained.	Before mobilization & continuous	

Child labor and forced labor risk (ESS2)	Prohibit child/forced labor; verify worker age and employment records.	Contractor; Supervisor	Worker registry with age verification; no child labor cases	continuous	
Community health & safety – **ESS4**	Install durable fencing; place warning signs; restrict unauthorized access at all times.	Contractor, Municipality	Perimeter fencing intact; signs in place	Continuous	800
Community safety risks near schools/sensitive receptors (ESS4)	Schedule noisy works outside school hours; install dust screens and warning signage	Contractor, Municipality	No school-related grievances, grievances work schedule.	Construction phase	
Traffic safety – **ESS4**	Deploy flaggers for truck movement; install temporary warning signs on access roads.	Contractor	No traffic incidents	Continuous	200
Limited GM awareness and Accessibility (ESS10)	Display GM posters; conduct community and worker awareness sessions	PCU; Contractor, Clinic Mgmt.	GM posters visible; grievances logged and resolved.	Construction & operation phase	
SEA/SH-sensitive grievance handling gaps (ESS4, ESS10)	Establish confidential SEA/SH channel, apply survivor-centered approach.	PCU, Clinic Mgmt, MoLAH.	Confidential channel functional	Operation phase	
Hazardous materials handling – **ESS3**	Store fuels on impermeable surfaces with secondary containment; ensure spill kits on site.	Contractor	Safe storage; spill kits available	Weekly	250
Chance finds – **ESS8**	Implement the chance-finds procedure: stop work, secure area, and notify authorities immediately.	Contractor; PCU	Workers aware of procedures	As needed	0
Operation phase					
Impact / Risk (ESS)	**Mitigation Measure**	**Responsible Party**	**Monitoring Indicator**	**Timing**	**Cost (USD)**
Medical & pharmaceutical waste – **ESS3/ESS4**	Implement clinical waste system: sharps boxes, labeled containers, secure locked storage, and disposal using approved methods.	Clinic Mgmt; MoLAH; Municipality	Waste logs; safe storage; proper containers	Daily/Weekly	600 per year

Sanitation & odor – **ESS4**	Apply daily cleaning/disinfection schedule; maintain drainage and ventilation.	Clinic Management	Clean, odor-free facility	Daily	300 per month
Disease transmission (zoonotic) – **ESS4**	Enforce PPE use; maintain hygiene stations; isolate sick animals; maintain vaccine cold chain.	MoLAH; Clinic Management	PPE compliance; hygiene adherence; cold-chain logs	Continuous	500 per year
Water use & wastewater – **ESS3**	Install water-efficient fixtures; maintain sealed soak-away systems; check for leaks routinely.	Clinic Management	Functional wastewater system	Weekly	200 per year
General solid waste – **ESS3**	Provide color-coded waste bins; ensure regular municipal collection.	Clinic Mgmt; Municipality	Clean premises; bins in place	Weekly	150 per month
Traffic & animal movement – **ESS4**	Establish designated livestock holding/unloading zones and apply one-way flow system.	Clinic Management	Smooth movement; no congestion	Continuous	0
Staff OHS risks – **ESS2**	Issue PPE; provide annual OHS training; maintain first-aid equipment.	Clinic Mgmt; MoLAH	PPE usage; training records; inspection logs	Monthly	400 per year
Fire & electrical risks – **ESS4**	Maintain solar and electrical systems; service fire extinguishers quarterly; train staff.	Clinic Management	Operational extinguishers; maintenance logs	Quarterly	300 per year
Chemical handling – **ESS2/ESS3**	Store chemicals in ventilated locked cabinets; label clearly; train staff on safe handling and spills.	Clinic Management	Organized storage; no spills	Monthly	150 per year

6.4 ESMP Implementation Arrangements

Effective implementation of the ESMP requires coordination between multiple stakeholders:

Project Coordination Unit (PCU – MoAI)

- Overall oversight of ESMP implementation.
- Ensure adherence to World Bank ESS requirements.
- Provide technical support and periodic supervision.
- Review and approve contractor ESMPs and OHS plans.

Contractor

- Implement all construction-phase mitigation measures.
- Provide PPE, enforce OHS procedures, maintain records, and report incidents.
- Ensure safe waste management, site security, and community protection.
- Assign a dedicated Environmental, Health, and Safety (EHS) focal person.
- Assign a dedicated GBV and GM focal person(s) throughout the construction phase of the project.

Supervising Engineer

- Conduct routine monitoring of contractor performance.
- Verify compliance with ESMP, OHS, and quality assurance standards.
- Issue corrective action instructions when needed.

Municipality of Bursalah

- Support waste disposal arrangements.
- Ensure local regulations are followed.
- Collaborate on community health and safety measures.

Veterinary Clinic Management (Operation Phase)

- Implement waste segregation, clinical waste management, sanitation measures, and infection control.

- Maintain OHS protocols, PPE distribution, and fire/electrical safety.
- Maintain incident registers and health/safety logs.

Community Representatives

- Participate in consultations and provide feedback through the GM.
- Report community concerns related to construction or operation.

6.5 Capacity Building Plan

Effective implementation of the ESMP for the Bursalah Veterinary Clinic requires targeted capacity building for the contractor, supervising engineer, clinic management, and relevant government institutions. Capacity strengthening will ensure that environmental, social, health, and safety requirements are well understood and consistently applied throughout construction and operational phases.

The plan focuses on training, awareness creation, provision of tools, and reinforcement of institutional roles in line with World Bank Environmental and Social Standards.

Objectives of the Capacity Building Plan

The main objectives are to:

- Strengthen the capacity of project staff, contractor teams, and clinic personnel to implement ESMP requirements.
- Ensure understanding of environmental, social, health, and safety (ESHS) responsibilities.
- Enhance compliance with ESS2 (Labor and Working Conditions), ESS3 (Pollution Prevention), ESS4 (Community Health and Safety), and ESS10 (Stakeholder Engagement).
- Build long-term local capacity for safe and sustainable management of veterinary services.
- Promote continuous learning and improvement in occupational health, community safety, and waste management procedures.

Table 5: Training Topics

A. Construction Phase Training				
Training Topic	**Target Group**	**Training Content (Short Description)**	**ESS**	**Estimated Cost (USD)**
Environmental & Social Safeguards	Contractor, Site Engineer	ESMP requirements, risks, mitigation actions	ESS1	250
Occupational Health & Safety (OHS)	Workers, Contractor Staff	PPE use, heat stress, emergency response, toolbox meetings	ESS2	300
Waste Management	Contractor Team	Segregation, hazardous waste handling, safe disposal	ESS3	200
Community Health & Safety	Contractor, Supervisor	Site fencing, signage, traffic safety, community protection	ESS4	200
Chance Finds Procedure	Contractor	Procedure to follow if cultural artifacts found	ESS8	350
GM Awareness	Contractor, Workers	GM steps, reporting process, complaint documentation	ESS10	400
B. Operation Phase Training				
Training Topic	**Target Group**	**Training Content (Short Description)**	**ESS**	**Estimated Cost (USD)**
Clinical Waste Management	Clinic Staff, MoLAH	Sharps handling, pharmaceutical waste, secure storage	ESS3, ESS4	250
Infection Prevention & Control	Veterinary Officers	Zoonotic diseases, hygiene protocols, animal isolation	ESS4	300
OHS for Clinic Staff	All Staff	PPE, fire safety, first aid, chemical exposure	ESS2	200
Safe Chemical Handling	Veterinary Staff	Labeling, storage, spill response	ESS2, ESS3	340
Community Awareness & Extension	Clinic Mgmt, MoLAH	Livestock health education, vaccination awareness	ESS10	360
GM Implementation	Clinic Management	Complaint intake, documentation, reporting	ESS10	250

6.6 ESMP Implementation Budget

The implementation of the Environmental and Social Management Plan (ESMP) for the Bursalah Veterinary Clinic requires financial resources to support mitigation measures during construction, ongoing operational safeguards, and capacity building. The total cost for implementing ESMP measures during construction is estimated at **USD 3,650**, covering site safety, waste management, OHS measures, environmental monitoring, and community engagement. During the operational

phase, the clinic will require **USD 2,100 annually** to maintain proper waste handling, sanitation, staff safety, fire and electrical safeguards, GM management, and wastewater system maintenance. Over a five-year period, this amounts to **USD 10,500**. Additionally, **USD 3,400** has been allocated for capacity building, including training for contractors, clinic staff, veterinary personnel, and community members. Overall, the total ESMP implementation cost for five years is **USD 17,550**, ensuring that environmental and social risks are effectively managed throughout the project lifecycle.

Sustainability of ESMP monitoring after FSRP completion will be ensured by integrating environmental and social monitoring into the routine operations of the Bursalah Veterinary Clinic under the Ministry of Livestock and Animal Husbandry (MoLAH), with continued regulatory oversight by the Ministry of Environment, Range and Climate Change (MoERCC) and coordination with the Bursalah District Administration. Monitoring responsibilities and costs will be absorbed into the clinic's regular operational budget and staff functions, ensuring continued compliance beyond project closure.

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 Bursalah 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.

SEA/SH-related complaints will be handled through a confidential, survivor-centered GM pathway that does not require written evidence, does not involve mediation with alleged perpetrators, and ensures voluntary referral to qualified GBV service providers, with survivor consent, data protection, and protection from retaliation guaranteed at all times.

Complaints may be submitted to the Contractor during construction or to the Clinic Management during operation. Community leaders and a complaint box at the site will also serve as additional 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.

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 was undertaken as part of the environmental and social assessment for the Bursalah Veterinary Clinic to ensure that community members, local authorities, and relevant institutions were informed about the project and had the opportunity to express their views, concerns, and expectations. The consultation process aligns with World Bank **ESS10** and emphasizes transparency, inclusiveness, and participation of all affected groups.

Consultations were held in Bursalah with community leaders, pastoralists, women and youth groups, district officials, and veterinary service actors. Their inputs informed project design, site selection, and the development of mitigation measures included in this ESMP.

7.2 Objectives of the Consultation Process

Stakeholder consultations were conducted to:

- Inform the community about the purpose, scope, and expected benefits of the veterinary clinic.
- Seek views on environmental and social risks and mitigation measures.
- Confirm community acceptance of the project site and voluntary land donation.
- Identify vulnerable groups and ensure their inclusion.
- Build community support for the construction and future operation of the facility.
- Establish communication channels for feedback and grievance handling.

7.3 Stakeholders Consulted

Consultations involved a broad range of stakeholders, including:

- Community elders and traditional leaders
- Bursalah District Administration
- Women's representatives and youth groups
- Pastoralist households and livestock keepers
- Local veterinary workers
- Neighbouring households to the project site
- Local administration and technical departments

The consultation attendance sheet confirms broad participation and representation from different segments of the community.

7.4 Summary of Consultation Activities Conducted

Consultations included:

- A community meeting at Bursalah village attended by elders, women, youth, and livestock owners.
- Site verification and discussions on land ownership and voluntary land donation.
- Meetings with district administration officials on regulatory and support roles.
- Technical discussions with local veterinarians and livestock officers on clinic functionality.
- Informal dialogues with women involved in milk and meat value chains.

The community demonstrated strong interest in the project and expressed readiness to collaborate during construction and operation.

7.5 Issues Raised by the Community and Responses Provided

Table 6: Issues Raised by the Community and Responses Provided

Key Issues Raised by Stakeholders	Responses / Actions Integrated in the ESMP
Need for accessible veterinary services to reduce livestock mortality	Clinic will include examination room, treatment area, medicine store, and vaccination services.
Concerns about improper disposal of veterinary waste	ESMP includes detailed clinical waste management procedures and coordination with the municipality.
Desire for affordable and accessible veterinary care	MoLAH will guide service pricing to ensure affordability for pastoral households.
Women requested inclusive access and training opportunities	Women's groups will be included in awareness and disease prevention activities.
Community requested employment opportunities during construction	Contractor encouraged to hire local labor based on skill availability.
Concerns regarding safety around the construction site	Site fencing, signage, traffic control, and community sensitization are included in ESMP.

7.6 Stakeholder Feedback on the Project Site

Stakeholders confirmed that:

- The site is community-owned and free from disputes.
- Land was voluntarily donated for public benefit.
- The proposed location is accessible and suitable for livestock movement.
- The site does not affect any vulnerable households or protected areas.
- The community supports the project and expects timely implementation.

7.7 Consultation Outcomes

The consultation process resulted in the following outcomes:

- Strong community support for the construction of the veterinary clinic.
- Consensus on the suitability of the project site and confirmation of land donation.
- Commitment from community leaders to assist in protecting the facility.
- Awareness created on construction risks, GM procedures, and community responsibilities.
- Inputs incorporated into project design, including waste management, safety, and service accessibility.

Overall, stakeholders expressed full support for the project and emphasized the importance of improving animal health services in the district.

7.8 Future Consultations

Continuous consultations will occur during:

Construction Phase

- Disclosure of construction schedule.
- Regular updates through meetings with elders and district authorities.
- GM awareness.

Operation Phase

- Community sensitization on clinic services.
- Veterinary awareness campaigns.
- Periodic meetings to obtain feedback on clinic performance.

8. Conclusion

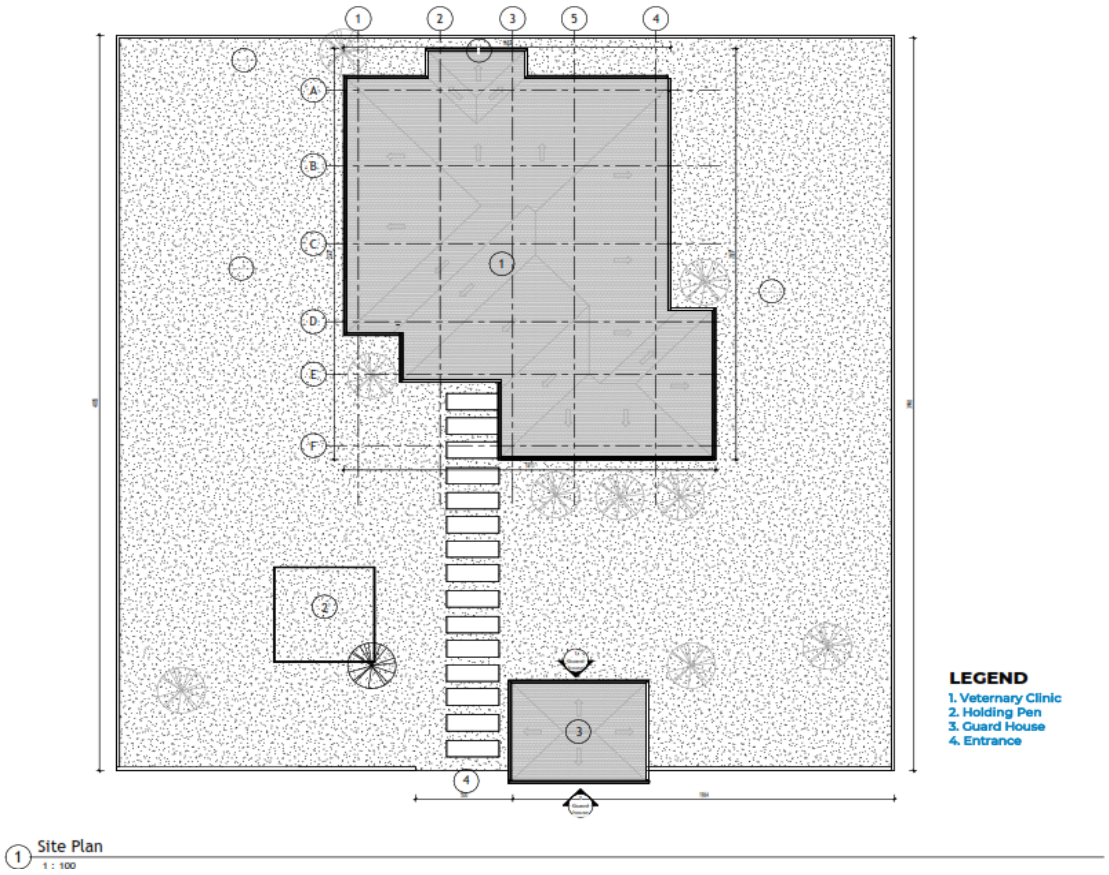
The Environmental and Social Management Plan (ESMP) for the Bursalah Veterinary Clinic provides a comprehensive framework to ensure that the project is implemented in an environmentally sound, socially responsible, and sustainable manner. The assessment confirms that the potential impacts associated with both the construction and operation phases are site-specific, predictable, and manageable through the mitigation measures proposed. Effective implementation of the ESMP—including the application of good construction practices, proper waste management, adherence to occupational health and safety requirements, and continued community engagement—will minimize risks to workers, nearby residents, and the natural environment.

Stakeholder consultations demonstrated strong community support for the project, particularly given the need for improved veterinary services to enhance livestock health and strengthen household resilience. With the establishment of a functional Grievance Mechanism (GM), clear roles and responsibilities for implementing the ESMP, and adequate budget allocation for mitigation, monitoring, and capacity building, the project is well positioned to achieve its intended benefits.

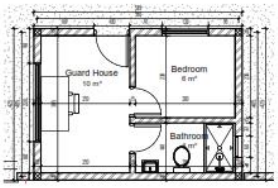
Overall, the ESMP confirms that the Bursalah Veterinary Clinic can be developed and operated safely and in full compliance with national regulations and World Bank Environmental and Social Standards. Continued monitoring, reporting, and engagement with stakeholders will ensure that environmental and social performance is maintained throughout the project lifecycle.

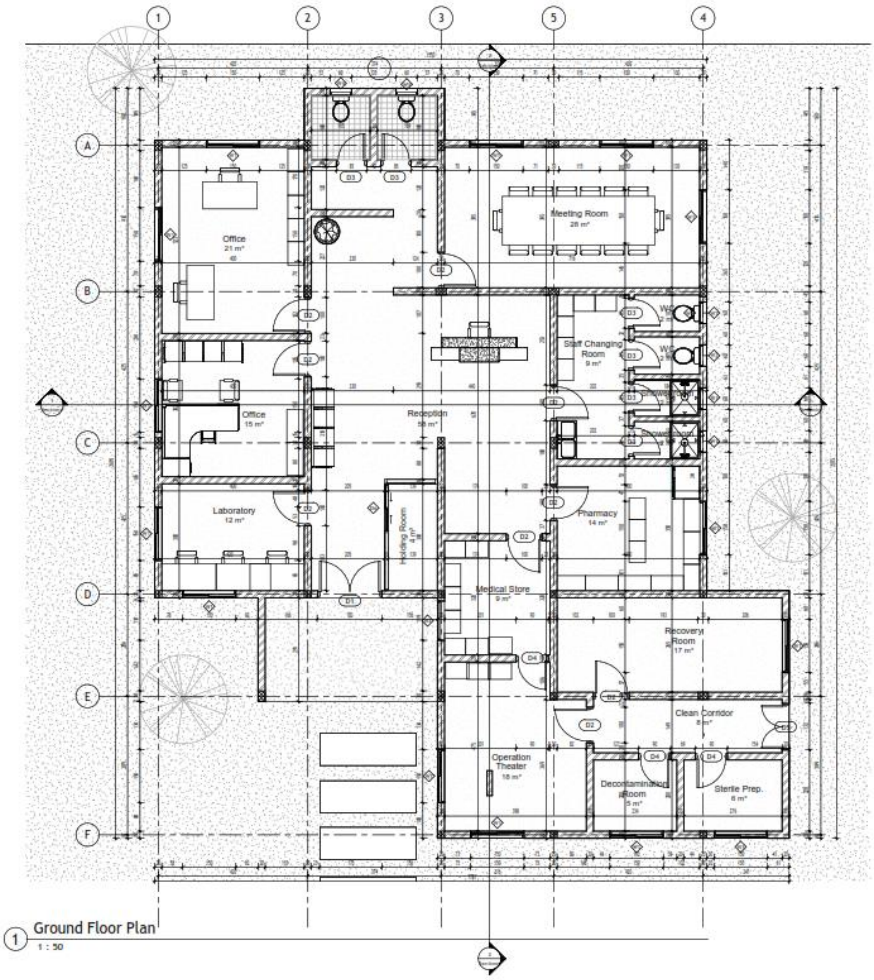
9. Annexes

9.1. Designs/ Layout Drawings



1 Site Plan
1 : 100





1 Ground Floor Plan
1 : 50

9.2. Land ownership documents

9.2.1. Land Registration Certificate

DAWLADDA PUNTLAND EE SOMALIA

Dawladda Hoose Ee Degmada Bursaalax

MULKIYADDA DHULKA (SOBRO LOGO)

0453

Taariikh: 15 / 7 / 2025

Mr/Mrs: Wasaaradda Xanaanada Xoolaha EE Dagmada Bursaalax

Waxaa laguu ogolaaday dhulkaad soo codsatay oo cabirkiisu dhan yahay

M² 40x40 kuyaal Degmada BURSAALAX

Tuulada ama Xaafada HALGAN

SOOHDIN LA LEH

Bari: Dhulbaanaan Mashruuca Waqooyi: ILma Yuusuf Geele

Koonfur: Wadada Zomah Galbeed: Wadada Zomah

dhulkaan haddaadan dhisan mudo

lix bilood ah masii lahaan kartit

saxiixa Duqa Magaalada

saxiixa Xoghayaha Guud

Waaxda Howlaha Guud & Guriyoynta Puntland-Somalia

BURSAALAH LOCAL GOVERNMENT

9.2.2. VLD Consent Form

VOLUNTARY LAND DONATION CONSENT FORM FOR THE FSRP PROJECT

ITEM	DESCRIPTION
Sub-project name:	Veterinary Clinic
Sub-project description:	Construction Veterinary Clinic
Project Location:	Buursalax
GPS coordinates of land required:	7°11' 12"N 47° 14' 23.1" E
Community, public, or private land:	Community Land

Please attach the community minutes and summary safeguards report explaining how the requirements for voluntary land donation for this sub-project have been met.

TERMS OF THE AGREEMENT

As discussed in our community minute on 29/10/2025.....to which all residents and regular users of the project site (specify) .....Buur Salah..... Were invited. We the nominated representatives at that meeting confirm that the following issues were discussed and the residents and regular users of this land are in unanimous agreement.

1. That ..above mentioned GPS site 40x40 meter..... Shall be site of the proposed .....Veterinary Clinic..... and that:
2. We all are aware that the land set aside for the investment is community land and no one is claiming individual ownership because it belongs to all of us, and no alternative claims will be made later on the land.
3. We have all agreed unanimously that the project implementation should continue.
4. We will all allow other neighbouring and cross-border communities access to the project site as agreed in the water management plan/MOU.
5. We all shall strive to peacefully resolve any conflicts with other communities concerning the project.
6. We will would strive to peacefully co-exist and resolve any conflict arising out of the investment facility following due process provided by local laws
7. The land is donated and identified as a public property in consultation with all residents and users of the land.
8. We all understand the likely impacts of proposed activities on donated land.
9. We all understand that the community have agreed the investment of this land for public use of only.

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10. We all agreed to this investment and donation of the land without coercion, manipulation, or any form of pressure on the part of public or traditional authorities.
11. We all agreed that we not require any monetary or non-monetary benefits or incentives as a condition for the donation.
12. Donation of land will not adversely affect the livelihoods of occupiers and users of the land.
13. If any structure will be moved or any access to land be limited as a result of the sub-project, support will be provided to the individual so their livelihoods are not adversely affected.
14. The land is free from encumbrances or encroachment and is not claimed by any individual and its ownership is not contested.

We have been designated by the community of (Buur Salax, Mudug, Puntland State of Somalia.

Confirm the above information to be true and that we have resolved to abide by ALL terms of this agreement. (Please attach minutes of the community meeting including the signed attendance sheet and photos of the meeting).

S/No.	Name	ID/No./Phone number	Role	Signature
1.	Deeq Abdullahi Sheikhdon	7790390	Chairman	
2.	Abdicatim Ahmed Caabi	7682077	member	
3.	Bashir Abdisalam Sugulle	7786180	member	
4.	Omar Aden Yusuf	7799743	member	
5.	Hawo Elmi Warsame	7799743	member	
6	Hafimo Ahmed Samater	7587761	member	

Agreed/ **Witnessed on this ..... Day of ..... in the Year.....: by:**

1. District court/Notary

Name	ID/No./cell number	Date	Signature
Mohamed Jamac Caabi	0907795957	29/10/2025	

NOOTAAYADA CAABI MG009 CBI PUBLIC NOTARY

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2. **District administration/Mayor**

Name	ID/No./cell	Signature
Mohamed Abdullahi Khalif	7-750197	

3. **Project Coordinator**

Name	ID/No./cell	Signature & R/Stamp
MOHAMED OSMAN SHIRE	0907782038	

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9.3. Stakeholder Consultation meetings' participant lists

FSRP SOMALIA FOOD SYSTEMS RESILIENCE PROJECT

Community/Stakeholder Engagement Meetings

Attendance Sheet

Location: Bur saalax

Date: 29/10/2025

No	Name	Gander	Title	Contact Number	Signature
1	Halimo Ahmed	F	Women Comunity	[redacted]	Halimo
2	Hawo Cilmi Warsame	F	Women Comunity	[redacted]	[illegible]
3	Abdifatah Cagay Yusuf	M	elders	[redacted]	[illegible]
4	Khadar Cilaahi Heshi	M	elders	[redacted]	[illegible]
5	Sakariye Farax Abdi	M	youth	[redacted]	[illegible]
6	Sugale Xaabseey	M	elders	[redacted]	Sugule
7	Cibakim Ahmed Heshi	M	elders	[redacted]	[illegible]
8	Cl Qadir Farax Warsame	M	elders	[redacted]	[illegible]
9	Mohamed Cl Adam	M	youth	[redacted]	[illegible]
10	Mohamed C/Qadir Hasan	M	yoat	[redacted]	[illegible]
11	Mubeshir Dahir Cumar	M	yoatt	[redacted]	[illegible]
12	Deeq Abdullah Sh.dan	M	elders	[redacted]	[illegible]
13	Mohamed Abdullah Khdir	M	elders	[redacted]	[illegible]
14	Omar Adam Yusuf	M	elders	[redacted]	[illegible]
15	Bashir Abdisalam	M	elder	[redacted]	[illegible]

9.4 ES Screening Checklist

ES Screening Form - Bursalah.docx

9.5. Photos for Consultation Meetings

Meeting with Municipality

Meeting with community representatives

9.6. Photos for Site Observation