SOMALIA FOOD SYSTEMS RESILIENCE PROJECT (S-FSRP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Activity Title:
The rehabilitation, renovation, landscaping, and water supply improvement for MoLAH HQ Office, Garowe, Puntland

For:
Food Systems Resilience Project (FSRP) – Puntland Component

Project Coordinates:
8°24'22"N 48°28'01"E

Date: February 2026

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List of Abbreviations

Abbreviation	Full Meaning
BH	Borehole
CBD	Convention on Biological Diversity
C-ESMP	Construction Environmental and Social Management Plan
CoC	Code of Conduct
DRM	Disaster Risk Management
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework (World Bank)
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard (World Bank)
ESS1–ESS10	World Bank Environmental and Social Standards 1 to 10
FGS	Federal Government of Somalia
FMS	Federal Member State
FSRP	Food Systems Resilience Project
GBV	Gender-Based Violence
ILO	International Labour Organization
M&E	Monitoring and Evaluation
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
WB	World Bank
WQ	Water Quality

Executive Summary

The Somalia Food Systems Resilience Project (FSRP), financed by the World Bank and implemented by the Federal Government of Somalia and Puntland State, aims to strengthen the resilience of Somalia's food systems to climate variability and shocks through climate-smart investments, improved natural-resource management, and enhanced institutional capacity. As part of this effort, the Ministry of Livestock and Animal Husbandry (MoLAH) is undertaking rehabilitation, renovation, landscaping, and water-supply improvements within its headquarters compound in Garowe. This Environmental and Social Management Plan (ESMP) has been prepared in line with the World Bank Environmental and Social Framework, the FSRP Environmental and Social Management Framework, and the Puntland Environmental Impact Assessment Act of 2023.

The subproject is fully contained within the existing MoLAH compound, located on government-owned land, and does not involve land acquisition or displacement. Planned works include rehabilitation of damaged sewage and sanitation systems, improved ventilation and building finishes, electrical and plumbing upgrades, construction of interlock walkways, development of a circular water fountain, and comprehensive landscaping to reduce dust and enhance the compound's aesthetics. A new 250-meter borehole will be developed to ensure reliable water supply after surface-water harvesting options were assessed and found unfeasible due to the site's rocky terrain, limited roof catchment area, and low rainfall.

The project area is characterized by a semi-arid climate with recurrent dust, limited vegetation, and inadequate water-supply infrastructure. Socially, the compound serves staff, pastoralists, and visitors on a daily basis, underscoring the need for improved safety, sanitation, accessibility, and SEA/SH safeguards. The project will deliver significant benefits including improved water security, enhanced hygiene and sanitation, stronger occupational health and safety practices, improved accessibility, reduced dust levels, and better overall working conditions.

Both construction and operational phases present environmental and social risks that are predictable and manageable. Construction-phase risks include solid and hazardous waste generation, dust, air and noise emissions, wastewater discharge, soil disturbance, groundwater contamination risks during drilling, fire and electrical hazards, chemical exposure, ergonomic and manual-handling risks, confined-space risks, working-at-height risks, vehicle-movement hazards, emergency-preparedness gaps, SEA/SH risks, and unauthorized public access. Operational-phase risks include poor waste management, water-quality deterioration, groundwater over-abstraction, sanitation failures, fire and electrical hazards, reduced accessibility for persons with disabilities, security weaknesses, degradation of landscaping and drainage systems, community interaction concerns, SEA/SH risks, and risks of regulatory non-compliance. All identified risks are site-specific, temporary, and can be effectively managed with the mitigation measures outlined in the ESMP.

The ESMP provides detailed mitigation and monitoring measures including dust and noise control, improved waste management, hazardous-material handling, drainage protection, groundwater-quality monitoring, PPE requirements, worker training, emergency-preparedness measures, site-access control, safety signage, and SEA/SH prevention through Codes of Conduct, awareness training, and a confidential, survivor-centered reporting process. Institutional responsibilities are clearly defined: MoLAH oversees ESMP implementation and the Grievance Mechanism (GM); contractors prepare and comply with a Contractor ESMP and maintain a worker-specific GM; the supervising engineer and FSRP PCU monitor compliance; MoERCC provides regulatory oversight; and municipal authorities support sanitation and waste-management functions.

A multi-channel Grievance Mechanism is in place, allowing concerns to be submitted through GM focal points, complaint boxes, supervisors, and contractor mechanisms, with escalation to the FSRP PCU and MoERCC when necessary. The national hotline remains available as a last-resort option. SEA/SH grievances follow confidential, survivor-centered procedures aligned with World Bank requirements.

The total ESMP budget amounts to **USD 37,300**, covering all required mitigation, monitoring, capacity-building, and grievance-management measures necessary for effective and compliant implementation of the subproject.

Overall, the MoLAH rehabilitation, landscaping, and water-supply improvement subproject is environmentally and socially feasible. With full adherence to the ESMP, the project is expected to improve institutional performance, strengthen environmental and social safeguards, enhance working conditions, and contribute meaningfully to the resilience objectives of the FSRP.

1. Introduction

1.1 Project Overview

The Somalia Food Systems Resilience Project (FSRP) is a World Bank–financed initiative implemented by the Federal Government of Somalia and Federal Member States, including Puntland State of Somalia. Its overall goal is to strengthen the resilience of Somalia's food systems to climate variability and shocks through climate-smart investments, improved natural resource management, and enhanced institutional capacity. Within this broader framework, the Ministry of Livestock and Animal Husbandry (MoLAH) in Puntland is undertaking a sub-project that involves rehabilitation, renovation, landscaping, and water-supply improvements within its headquarters compound, with the aim of improving institutional functionality, environmental performance, and service delivery for the livestock sector.

In accordance with FSRP's climate-resilience principles, the project prioritizes the use of surface water and rainwater harvesting before considering groundwater abstraction. However, an assessment of the MoLAH compound confirmed that no viable surface water harvesting options exist within the site. There are no natural catchments, depressions, or surface-water retention features, and the rocky, gently sloping terrain does not allow for meaningful runoff retention. The available roof areas are also insufficient to generate harvestable volumes capable of meeting the compound's basic sanitation and operational water needs. Given these constraints, the use of surface water is technically and economically unfeasible, and borehole development is adopted only as a last-resort option to ensure water security for essential facility functions. The drilling of a new borehole (approximately 250 meters deep) to ensure a reliable water supply for sanitation will be developed and managed with strict groundwater protection and sustainable abstraction measures, consistent with the Puntland Water Resources Act (2003) and the requirements of World Bank ESS3.

The sub-project is expected to support institutional resilience by improving the physical work environment, strengthening sanitation systems, enhancing occupational health and safety, reducing environmental hazards such as dust, providing reliable water supply, and increasing the overall efficiency of MoLAH operations. It will contribute to improved service delivery, staff welfare, micro-climate enhancement, and environmental sustainability. In doing so, the intervention aligns with broader FSRP objectives related to climate resilience, natural-resource management, livestock-sector strengthening, and institutional capacity development.

The intervention will be implemented over a defined period consistent with the FSRP Puntland work plan, covering procurement, civil works, borehole drilling and testing, landscaping, and environmental and social monitoring activities. The sub-project is financed under the FSRP budget, with ESMP-related mitigation, monitoring, capacity building, and grievance-handling costs integrated into both contractor obligations and MoLAH's operational responsibilities.

Environmental and social screening undertaken in line with the FSRP Environmental and Social Management Framework (ESMF) categorizes the sub-project as having a **Moderate** overall risk. The anticipated impacts are site-specific, temporary, and manageable through established mitigation measures addressing construction activities, waste management, borehole drilling, occupational health and safety, and limited risks related to interactions between workers and facility users. No significant, irreversible, or large-scale impacts are expected when mitigation measures are fully implemented.

Public consultations were held with MoLAH staff and facility users on 18 December 2025. Key issues raised—including water scarcity, sanitation concerns, occupational health and safety, waste management, potential disruption of office activities during construction, and SEA/SH risks—have been incorporated into the ESMP. The engagement process complies with World Bank ESS10 on stakeholder engagement and information disclosure.

The subproject complies with the World Bank Environmental and Social Framework (ESS1–ESS10), the FSRP-ESMF, and the Puntland Environmental Impact Assessment Act (2023). All rehabilitation works, landscaping activities, and the borehole component will adhere to applicable environmental, labor, water-resource, and public-health regulations.

Overall, the sub-project will contribute to improved institutional efficiency, staff well-being, environmental performance, and sustainable service delivery, in line with the objectives of the FSRP.

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

The purpose of this Environmental and Social Management Plan (ESMP) is to identify, assess, and manage the environmental and social risks and impacts associated with the rehabilitation, landscaping, and borehole drilling activities within the MoLAH office compound. The ESMP provides a framework to ensure that potential adverse impacts are avoided, minimized, mitigated, or managed in accordance with the World Bank Environmental and Social Framework (ESF) + 10ESSs, and the Puntland Environmental Impact Assessment Act (2023).

The ESMP serves as a practical implementation tool for MoLAH, contractors, supervising engineers, and relevant government authorities by defining mitigation measures, monitoring requirements, institutional responsibilities, reporting arrangements, and grievance handling mechanisms throughout project implementation and operation.

1.3 Scope of the ESMP

This Environmental and Social Management Plan (ESMP) applies to all activities associated with the rehabilitation, renovation, landscaping, and water-supply improvement works to be undertaken within the MoLAH headquarters compound in Garowe, Puntland. The ESMP defines the environmental and social requirements, mitigation measures, monitoring responsibilities, and

institutional arrangements needed to ensure that the sub-project is implemented in compliance with the World Bank Environmental and Social Framework (ESF), the FSRP Environmental and Social Management Framework (ESMF), and relevant Puntland environmental legislation, including the Puntland Environmental Impact Assessment Act (2023).

The ESMP covers the entire project lifecycle, including both the construction (rehabilitation) phase and the operational phase, recognizing that each phase presents distinct environmental and social risks that require tailored mitigation and monitoring measures. It also outlines the monitoring indicators, frequency, and reporting requirements applicable during each phase to ensure continuous compliance and timely corrective action.

Geographically, the ESMP applies only to works conducted within the existing MoLAH compound, where all rehabilitation, landscaping, and borehole-drilling activities will occur. No off-site works, land acquisition, or expansion beyond current compound boundaries are involved, and therefore no physical or economic displacement is expected.

Institutionally, the ESMP is applicable to MoLAH as the project owner, the engaged contractors, supervising engineers, the FSRP Project Coordination Unit, and relevant oversight authorities, including the Ministry of Environment, Range and Climate Change (MoERCC). It defines their respective roles in implementing mitigation measures, monitoring compliance, managing grievances, and ensuring adherence to environmental, health, safety, and social requirements.

The ESMP covers key environmental and social dimensions, including:

Resource efficiency, such as water conservation and prudent energy use during works;

Pollution prevention and control, including management of hazardous and non-hazardous waste, wastewater, emissions, and drilling by-products;

Community health and safety, including access control, traffic safety, and public protection during works;

Labor and working conditions, such as occupational health and safety (OHS), worker welfare, and prevention of child labor or forced labor;

Stakeholder engagement and the Grievance Mechanism (GM**)**, ensuring transparent communication and accessible channels for concerns.

The scope also encompasses the sub-project's compliance obligations, including adherence to the World Bank ESF (ESS1–ESS10, except ESS7 and ESS9 which are not relevant), the FSRP-ESMF, and the Puntland EIA Act (2023), ensuring that environmental and social standards are integrated into both construction and operational practices.

Furthermore, the ESMP includes monitoring and reporting arrangements for both project phases, detailing indicators, responsibilities, and frequencies to ensure effective oversight. It also outlines the capacity-building needs of MoLAH, contractors, and supervising personnel, supporting

long-term sustainability of environmental, social, health, and safety management beyond project completion through training and institutional strengthening.

1.4 Description of Project Activities

The MoLAH office rehabilitation and landscaping sub-project comprises a set of integrated activities designed to improve the functionality, safety, environmental performance, and service-delivery capacity of the Ministry's headquarters compound. All activities are confined within the existing MoLAH premises. The revised description of works includes the following components:

A. Sewage and Sanitation Rehabilitation

The project will remove existing damaged manholes, sewer pipelines, and sanitation fixtures and replace them with a complete internal sewage system. This includes installation of new PVC sewer lines, manholes, toilet fixtures, plumbing accessories, and approved aluminum toilet doors to improve hygiene and ensure compliance with public health standards.

B. Building Rehabilitation and Finishing Works

Damaged floors will be removed and replaced with new ceramic tiles; internal and external walls will be repainted using approved textured and silk paint; and ceilings will be repaired or replaced. General civil finishing works will restore the structural quality and visual condition of the office buildings.

C. Doors, Ventilation, and Comfort Improvements

The rehabilitation includes replacing old or damaged doors with weather-resistant units, installing additional air-conditioning systems, improving ventilation, and adjusting the placement of toilet doors with associated masonry works.

D. Electrical and Plumbing Upgrades

Beyond the sanitation upgrades, the project will improve the electrical system, including rewiring where needed, installation of safe and efficient lighting, replacement of defective switches and outlets, and integration of electrical safety fixtures. Plumbing upgrades will accompany the sanitation works to ensure reliable water distribution, leak reduction, improved pressure management, and durable fittings.

E. Circular Water Fountain Construction

A new circular fountain will be constructed, involving excavation, concrete foundation, masonry, plastering, waterproofing, plumbing connections, electrical fittings, pumps, and lighting, followed by full testing and commissioning.

F. Interlock Walkways

Designated pathways within the compound will be excavated, leveled, and fitted with interlocking paving blocks, including proper bedding, compaction, and edge restraints to improve accessibility and reduce dust.

G. Borehole Drilling and Water-Supply Development

A new borehole of approximately 250 meters will be drilled to provide a reliable water source for sanitation, landscaping, and office use. Works include casing, gravel packing, development, pumping tests, water quality testing, and installation of headworks, followed by submission of a completion report.

H. Drainage and Stormwater Management

Landscaping improvements will incorporate drainage features to prevent waterlogging, direct stormwater safely away from buildings, reduce erosion, and improve the compound's resilience to heavy rains.

I. Safety and Accessibility Features

Works will include installation or improvement of fire-safety features (extinguishers, alarms, signage), emergency exits, accessibility ramps, and directional signage to ensure compliance with occupational health and safety and accessibility standards.

J. Waste Management Facilities

The project will establish designated waste-collection points and provide waste bins to support proper segregation and disposal during both construction and operation, as highlighted in the ESMP's operational mitigation measures.

K. Security Enhancements

To strengthen facility safety and controlled access, the project may include upgrades to perimeter fencing, reinforcement of gates, and installation of controlled access systems where needed.

L. Environmental Enhancements

Landscaping will go beyond paving and basic greening to include planting of shrubs, trees, and ornamental vegetation aimed at improving microclimatic conditions, reducing dust, and enhancing environmental aesthetics within the compound.

M. Temporary Works for Construction

Construction will involve temporary site-preparation activities, including establishment of material storage zones, contractor work areas, and basic worker facilities. These temporary works

ensure compliance with environmental, social, health, and safety requirements during construction.

1.5 Methodology

The preparation of this ESMP followed a structured and evidence-based methodology consistent with the FSRP Environmental and Social Management Framework (ESMF), the World Bank Environmental and Social Framework (ESF), and applicable Puntland legislation. The methodology included:

- **Desktop review** of relevant FSRP safeguard documents, World Bank ESSs, and national environmental, labor, and water resource laws;
- **Review of the MoLAH rehabilitation project description and technical scope** to identify potential environmental and social risks associated with rehabilitation and borehole drilling activities;
- **Application of the FSRP Environmental and Social Screening tools** to determine the environmental and social risk classification and applicable safeguards requirements;
- **Identification of mitigation and monitoring measures** proportionate to the scale and nature of the proposed activities; and
- **Institutional analysis** to define roles, responsibilities, and arrangements for ESMP implementation, monitoring, reporting, and post-project sustainability.

This methodology ensures that the ESMP is practical, proportionate, and aligned with both regulatory requirements and the operational context of MoLAH.

2. Policy, Legal, and Administrative Framework

2.1 Introduction

This section presents the policy, legal, and institutional frameworks applicable to the implementation of the MoLAH Office Rehabilitation, Landscaping, and Borehole Drilling sub-project. The Environmental and Social Management Plan (ESMP) has been prepared in compliance with the legal and regulatory requirements of the Federal Government of Somalia (FGS), Puntland State of Somalia, and the World Bank Environmental and Social Framework (ESF).

The objective of this framework is to ensure that all rehabilitation and associated activities are implemented in an environmentally sound, socially responsible, and legally compliant manner. Where differences exist between national regulations and World Bank requirements, the more stringent provisions apply.

2.2 National Legal and Regulatory Framework

2.2.1 Federal Government of Somalia (FGS) Policies and Regulations

At the national level, the Federal Government of Somalia provides overarching policy direction and legal principles governing environmental protection, labor standards, water resource management, gender equality, and disaster risk reduction. These instruments complement Puntland State legislation and guide harmonized safeguards implementation.

A. Provisional Constitution of the Federal Republic of Somalia (2012)

The Constitution establishes the fundamental obligation of the State to protect the environment and natural resources for present and future generations. It recognizes the right of citizens to a clean and healthy environment and provides the legal basis for environmental governance, public health protection, and labor rights applicable to public infrastructure projects.

B. National Environmental Policy (2015)

The National Environmental Policy sets Somalia's strategic vision for sustainable environmental management. It emphasizes pollution prevention, sustainable use of natural resources, protection of water resources, proper waste management, and integration of environmental considerations into development planning. The policy provides national guidance relevant to rehabilitation works, sanitation upgrades, landscaping, and groundwater use.

C. Federal Environmental Impact Assessment (EIA) Policy and Draft Environmental Management Legislation

The federal EIA policy and draft environmental legislation establish procedural guidance for environmental and social assessment of development projects. While Puntland applies its own EIA Act, these federal instruments promote harmonization of safeguards practices and alignment with international standards, including those of the World Bank.

D. National Water Resources Strategy and Policy

Federal water sector policies promote sustainable groundwater abstraction, protection of water quality, and equitable access to water resources. These policies are directly relevant to the borehole drilling component of the sub-project and reinforce requirements for authorization, pumping tests, water quality analysis, and sustainable operation.

E. Federal Labour Code (1972, as amended and applied)

The federal labour framework sets minimum standards for employment conditions, occupational health and safety, and worker protections. These standards complement Puntland labour regulations and support compliance with World Bank ESS2 on Labor and Working Conditions.

F. National Gender Policy (2016)

The National Gender Policy promotes gender equality, protection against gender-based violence, and inclusive participation in public institutions. It supports the integration of SEA/SH prevention measures, worker codes of conduct, and gender-sensitive grievance mechanisms within the ESMP.

G. National Disaster Risk Management (DRM) Policy

The national DRM policy promotes disaster preparedness, risk reduction, and resilience-building across all sectors. Improved sanitation, drainage, water management, and safe facility rehabilitation under the sub-project contribute to institutional resilience in line with national DRM objectives.

2.2.2 Puntland State Legal and Regulatory Framework

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

The Puntland EIA Act (2023) is the primary legally binding instrument governing environmental and social assessment and management of development projects in Puntland. It requires environmental and social screening and preparation of appropriate safeguards instruments, including ESMPs, prior to project implementation. The Act mandates the Ministry of Environment, Range and Climate Change (MoERCC) to review, approve, and monitor ESMP compliance.

B. Puntland Environmental Management Law, 2023

This law provides the overarching framework for environmental protection and sustainable natural resource management in Puntland. It addresses pollution control, waste management, biodiversity protection, and sustainable use of land and water resources. It is directly relevant to construction waste handling, wastewater management, landscaping, and groundwater abstraction.

C. Puntland Labour Law, 2004

The Puntland Labour Law governs employment conditions, occupational health and safety, and worker rights. It requires provision of safe working environments, personal protective equipment, medical care, and fair employment practices. These provisions apply to all contractors and workers engaged in the rehabilitation works.

D. Puntland Water Resources Act, 2003

This Act regulates borehole drilling, groundwater abstraction, and protection of water resources. All borehole development activities must comply with authorization, testing, and monitoring requirements to ensure sustainable water use and prevent contamination.

E. Puntland Public Health Law, 2007

The Public Health Law safeguards hygiene, sanitation, water quality, and disease prevention. Rehabilitation of sewage systems, toilets, and water supply infrastructure under the sub-project must comply with this law to protect staff, visitors, and surrounding communities.

F. Puntland Urban Planning and Construction Code, 2018

This code establishes standards for construction, rehabilitation, safety, and accessibility of buildings and infrastructure in urban areas. All civil works under the MoLAH rehabilitation will comply with approved construction standards and municipal permitting processes.

G. Puntland Disaster Risk Management (DRM) Policy, 2024

The policy promotes integration of disaster risk reduction and climate resilience into development projects. Landscaping, improved drainage, safe sanitation, and resilient water supply systems under the sub-project align with this policy.

2.3 Institutional Framework

The implementation of this ESMP involves several institutions with distinct responsibilities for oversight, regulation, implementation, and monitoring. Their roles are summarized in the table below.

Table 1. Institutional Roles and Responsibilities for ESMP Implementation

Institution	**Role in ESMP Implementation**
Ministry of Livestock and Animal Husbandry (MoLAH)	Project owner; oversees ESMP implementation; designates E&S focal point; manages OHS, waste, sanitation, groundwater protection, and GM.
Ministry of Environment, Range and Climate Change (MoERCC)	Regulatory authority; conducts inspections; enforces compliance with Puntland EIA Act.
FSRP Implementing Structures (MoAI / PCU)	Ensures ESMP compliance with FSRP ESMF and WB ESSs; consolidates reports; provides technical support.
Supervising Engineer / Consultant	Monitors compliance; documents findings; issues corrective actions; ensures C-ESMP alignment.
Contractors	Implement construction-phase ESMP measures; enforce labor and OHS standards; maintain records.

Municipal Authorities	Support waste collection; oversee sanitation; assist in grievance handling.

2.4 World Bank Environmental and Social Framework (ESF) + 10ESSs

The World Bank Environmental and Social Framework (2018) applies to all FSRP-financed activities and provides a risk-management approach to ensure environmentally and socially responsible project implementation. The ESF consists of 10 Environmental and Social Standards (ESSs). The following ESSs are applicable to the MoLAH rehabilitation, landscaping, and borehole drilling sub-project.

Table 2: WB ESS

ESS	**Title**	**Expanded Relevance**
ESS1	Assessment and Management of Environmental and Social Risks and Impacts	Guides screening, ESMP preparation, and risk classification; covers waste, dust, noise, OHS, community safety.
ESS2	Labor and Working Conditions	Requires safe working conditions, PPE, contracts, worker GM, child labor prevention, and Codes of Conduct.
ESS3	Resource Efficiency and Pollution Prevention and Management	Covers waste management, wastewater control, dust/noise suppression, groundwater sustainability.
ESS4	Community Health and Safety	Ensures safety for staff and visitors; covers access control, traffic, fire/electrical safety, drilling risks.
ESS5	Land Acquisition and Involuntary Resettlement	Not triggered; no land acquisition or displacement.
ESS6	Biodiversity Conservation	Ensures landscaping does not affect habitats; requires groundwater protection.
ESS8	Cultural Heritage	Applies Chance-Find Procedures during excavation activities.
ESS10	Stakeholder Engagement and Information Disclosure	Requires ongoing engagement and accessible GM.

2.5 International Conventions and Agreements

Somalia is a signatory to several international conventions relevant to this ESMP, including the Convention on Biological Diversity (CBD), the United Nations Framework Convention on Climate Change (UNFCCC), the United Nations Convention to Combat Desertification (UNCCD), International Labour Organization (ILO) Conventions, and the Basel Convention on hazardous waste management. These conventions reinforce sustainable resource management, climate resilience, labor protection, and environmentally sound waste handling.

2.6 Compliance and Coordination

Implementation of this ESMP requires coordinated action among MoLAH, MoERCC, FSRP implementing structures, municipal authorities, contractors, and supervising engineers. Environmental and social mitigation measures will be integrated into construction contracts, supervision arrangements, and operational procedures. MoERCC will conduct periodic compliance inspections, while FSRP structures will oversee adherence to World Bank ESS requirements. This coordinated approach ensures effective environmental and social risk management during rehabilitation and sustained compliance during operation.

3. Project Area Description

3.1 General Location

The MoLAH Office Rehabilitation, Landscaping, and Borehole Drilling sub-project is located within the **Ministry of Livestock and Animal Husbandry (MoLAH) compound** in Puntland State of Somalia. The compound is situated within an established urban administrative area and serves as the headquarters for livestock sector governance, veterinary services coordination, and stakeholder engagement at the state level.

The project activities will be confined entirely within the existing MoLAH compound boundaries. No off-site works or expansion beyond the compound footprint are anticipated. Access to the site is provided through existing gates connected to the surrounding road network, which supports routine staff movement, service delivery, and visitor access.

Figure 1: MoLAH Compound Map

3.2 Land Ownership and Tenure

The MoLAH compound is located on **public/government-owned land** under the administration of the Puntland State of Somalia. The land is legally allocated for institutional use and currently hosts MoLAH office buildings, meeting halls, laboratories, sanitation facilities, fencing, and ancillary infrastructure.

All proposed rehabilitation, landscaping, and borehole drilling activities will take place within the existing compound boundaries. **No land acquisition, resettlement, or restriction of land use is required**, and therefore World Bank ESS5 (Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement) is not triggered. Any required land ownership documentation and authorization for works will be maintained by MoLAH and made available for regulatory review.

3.3 Accessibility and Infrastructure

The MoLAH compound is accessible via existing paved and unpaved roads serving the surrounding administrative and institutional area. Entry and exit points are already established, with controlled access managed by on-site security personnel. During rehabilitation works, access arrangements will be maintained to ensure staff safety and continuity of essential services.

Existing infrastructure within the compound includes office buildings (G+1), meeting halls, laboratories, fencing, toilets, and limited water storage facilities. Electricity is available through existing supply arrangements. Water supply is currently dependent on trucking, which has contributed to water scarcity challenges within the compound. The proposed borehole drilling aims to address this constraint by providing a reliable on-site water source.

4 ENVIRONMENTAL AND SOCIAL BASELINE

A. Environmental Baseline

Physical Environment and Topography

The MoLAH headquarters compound is situated on **rocky, stable ground** with a **gentle southeastern slope**, providing natural drainage and minimizing risks of waterlogging. No history of flooding, standing water, or significant erosion has been reported. The compacted soils and limited pervious areas indicate low infiltration potential but high structural stability.

Climate

Garowe experiences a **semi-arid to arid climate**, characterized by:

- High temperatures throughout most of the year
- Very low annual rainfall
- Strong seasonal winds contributing to dust circulation
- Significant intra-annual temperature variability

These conditions influence water availability, vegetation cover, and the need for climate-resilient infrastructure.

Air Quality Baseline

Air quality within the MoLAH compound is primarily influenced by:

- **Unpaved surfaces** producing fine dust, especially during wind events
- Vehicle movement by staff, visitors, and service providers
- **Sparse vegetation**, reducing natural dust suppression
- Occasional smoke from nearby facilities or waste burning (indirect effect)

During construction, dust will increase due to:

- Demolition
- Removal Of Tiles
- Excavation For Sewer Lines, Walkways, And The Borehole
- Movement Of Construction Materials

These baseline conditions justify dust suppression, PPE, and scheduling controls.

Noise Baseline

Baseline noise levels in the compound are **low to moderate**, originating from:

- Routine Office Activity
- Light Vehicle Traffic
- Laboratory Operations
- Staff Movement

The surrounding area is institutional, with no high-noise industries nearby. However, **construction-phase noise** from drills, compressors, generators, and trucks will significantly exceed baseline conditions, requiring temporal controls and communication with staff.

Soil and Geology

The site's geology consists of **rocky, load-bearing soils**, suitable for:

- Excavation Of Utility Lines
- Foundation Upgrades
- Borehole Drilling

The stable substrate also reduces flood and erosion hazards. However, contamination risks exist if hazardous construction materials spill onto exposed soil.

Water Resources

There is **no existing borehole** or natural water source on the premises. All water is currently **trucked in**, presenting:

- Reliability Challenges
- Sanitation Constraints

Operational Limitations for Laboratories and Offices

The new borehole (approx. 250 m) will address this need but introduces groundwater-protection considerations.

Existing Waste Management Practices

Solid Waste

Current issues include:

- Open waste piles in several corners of the compound
- Few waste bins and lack of segregation
- Reliance on private company collection with irregular pickup
-

Liquid Waste

- The old sewage system leaks in some areas
- Deteriorated manholes and pipelines
- Risk of greywater discharge to open ground

These deficiencies justify the rehabilitation of sewer lines, new manholes, and installation of waste collection infrastructure.

Existing Utilities and Infrastructure

Key features:

- **Electrical systems** are outdated, with inconsistent wiring and inadequate safety mechanisms
- **Ventilation** in some buildings is poor, contributing to discomfort
- **Drainage infrastructure** is minimal; surface flows rely on natural gradients
- **Walkways** are incomplete or damaged, limiting safe movement between buildings

These issues will be addressed through electrical upgrades, improved ventilation, walkway construction, and drainage enhancements.

4. Social Baseline

Demographic Profile

Users of the compound include:

- MoLAH staff (technical, administrative, laboratory)
- Visitors linked to livestock services
- Pastoralists requiring support
- Stakeholders attending meetings or trainings

Daily foot traffic fluctuates but may reach dozens of individuals during peak operational days.

Gender Dynamics

Women are present in multiple roles (administration, technical services, visitors), but:

- Sanitation Facilities Are Not Gender-Segregated
- Privacy Is Limited
- Female Participation In Consultations Must Be Strengthened

Future stakeholder engagements will adhere to a minimum 30% participation for women, including decision-making roles.

Vulnerable and Minority Groups

Persons with Disabilities

Access barriers include:

- Absence Of Ramps
- Uneven Walkways
- Narrow Doorways
- Lack Of Accessible Toilets

These challenges will be addressed through universal-design modifications.

Other Vulnerable Groups

- Low-literacy pastoralists visiting the compound
- Guests who may not understand safety requirements

They will require visual signage, access control, and clear communication.

Socio-Economic Context

The compound is located in a mixed-use institutional area with:

- A nearby hotel
- An orphan college ~1 km away
- Commercial activities (vendors, small shops, transport providers)

The project is expected to contribute to:

- Temporary Job Opportunities
- Demand For Local Services (Food, Transport, Materials)

The surroundings contain **no sensitive receptors** such as hospitals or schools adjacent to the compound, reducing community risk from construction activities.

Health and Safety Conditions

Existing issues:

- Insufficient water compromises hygiene
- Old sanitation infrastructure leaks or clogs
- Poor ventilation and lighting in some areas
- No consistent fire-safety equipment
- Limited PPE use
- Slip/fall hazards in outdoor areas

These justify the need for OHS integration, fire-safety systems, and better facility maintenance.

Community Interaction

The compound is a hub for:

- pastoralists
- livestock traders
- veterinarians
- private-sector service providers

Interactions are frequent and require community-sensitive safety measures during construction (signage, fencing, controlled access).

Stakeholder Dynamics

Stakeholders include:

- MoLAH leadership
- MoERCC (environment regulator)
- Municipal sanitation and waste departments
- FSRP PCU
- Contractors and supervising engineers
- Livestock-sector actors

Existing feedback pathways are informal: verbal communication, complaint boxes, and GM channels. A formalized GM will improve accountability.

5. Cultural Heritage Screening

Although no heritage resources were found within or near the compound, excavation for:

- Sewer Systems
- Water Fountain
- Walkways
- Borehole Drilling

Although it introduces a small risk of encountering archaeological materials. The project will apply **Chance-Find Procedures** including:

- Immediate Stop of Work
- Securing the area
- Notifying MoERCC
- Evaluation by Qualified Personnel

Environmental and Social Sensitivities

Environmental Sensitivities

- **Soil sensitivity:** Low, but spill-prone areas require controls
- **Groundwater sensitivity:** Moderate due to reliance on a new borehole
- **Air quality sensitivity:** Medium due to dust potential
- **Noise sensitivity:** Low–medium given administrative surroundings
- **Biodiversity sensitivity:** Very low due to urban setting with minimal vegetation

Social Sensitivities

- **Worker OHS risks:** Medium due to construction activities
- **Visitor/public safety:** Moderate; fencing and barriers required
- **SEA/SH risks:** Medium, requiring CoC and confidential GM
- **Accessibility risks:** High for disabled users due to current facility conditions
- **Community interface risks:** Low but present during construction

These sensitivities reinforce the necessity of a strong ESMP and monitoring system.

4. Evaluation of Environmental and Social Impacts

4.1 Overview

This section identifies and evaluates the potential environmental and social impacts associated with the rehabilitation, landscaping, and borehole drilling activities within the MoLAH office compound. The assessment is based on the project description, site observations, and the Environmental and Social Screening Checklist conducted under the FSRP framework.

The analysis considers impacts during both the rehabilitation (construction) phase and the operational phase, distinguishing between beneficial impacts and potential adverse impacts. The evaluation follows the principles of the World Bank Environmental and Social Standards (ESS1–ESS10) and applicable national legislation.

Overall, the project is characterized by site-specific, temporary, and manageable impacts, with no significant or irreversible environmental or social effects anticipated, provided that the ESMP mitigation measures are implemented.

4.2 Beneficial Environmental and Social Impacts

The sub-project is expected to generate several positive environmental and social outcomes, including:

A. Improved Institutional Functionality and Service Delivery

Rehabilitation of offices, sanitation facilities, and utilities will improve MoLAH's operational efficiency, enabling better coordination of livestock services, veterinary oversight, and sector governance.

B. Enhanced Occupational Health, Safety, and Staff Well-being

Upgraded sanitation systems, improved ventilation, better indoor finishes, and reliable water supply will create a safer and healthier working environment for staff and visitors.

C. Improved Water Security and Hygiene

The drilling of a new borehole will provide a reliable on-site water source, reducing dependence on water trucking and improving sanitation, cleaning, and landscaping practices.

D. Environmental Quality and Aesthetics

Landscaping, paving, and greening activities will reduce dust, improve drainage, enhance micro-climatic conditions, and improve the overall appearance of the compound.

E. Employment Opportunities

The rehabilitation works will generate short-term employment opportunities for skilled and unskilled local labor during implementation.

4.3 Potential Adverse Environmental and Social Impacts

Although the project is largely beneficial, certain adverse impacts may occur if not properly managed. These are assessed by project phase.

4.3.1 Rehabilitation (Construction) Phase Impacts

Table 3: Adverse ES impacts Construction Phase

Impact Area	Description of Potential Impact	Relevant ESS
Construction & Demolition Waste	Debris generation (tiles, pipes, concrete, packaging) requiring safe disposal.	ESS3
Hazardous Waste	Risks from oils, lubricants, paints, solvents, adhesives, batteries, or e-waste.	ESS3

Dust & Air Emissions	Dust from demolition, cutting, drilling, sanding; emissions from generators and machinery.	ESS3, ESS4
Noise & Vibration	Disturbances from drilling rigs, power tools, machinery, affecting staff and visitors.	ESS4
Wastewater Generation	Improper discharge of wastewater from cleaning, curing, drilling fluids.	ESS3
Soil Disturbance	Localized excavation for pipelines, manholes, walkways, landscaping, and borehole drilling.	ESS1
Groundwater Risks During Drilling	Turbidity, contaminated drilling fluids, improper cuttings disposal.	ESS3
Occupational Health & Safety (OHS)	Injuries due to unsafe tools, inadequate PPE, unsafe work practices, electrocution risks.	ESS2
Fire & Electrical Hazards	Risks from faulty wiring, temporary power setups, overheating equipment, absence of fire-safety measures.	ESS2, ESS4
Chemical Exposure Risks	Health risks from paints, adhesives, solvents, cleaning chemicals.	ESS2, ESS3
Ergonomic & Manual Handling Risks	Injuries due to lifting heavy materials, awkward postures, repetitive tasks.	ESS2
Traffic & Vehicle Movement Risks	Construction vehicles moving within compound posing risks for staff/visitors.	ESS4
Confined Space Risks	Hazards in manholes, sewer lines, chambers (oxygen deficiency, toxic gases).	ESS2, ESS4
Working at Heights	Falls from ladders, roofs, scaffolding during ceiling and roof repairs.	ESS2
Emergency Preparedness Gaps	Lack of fire extinguishers, first-aid kits, emergency plans, evacuation routes.	ESS2, ESS4

Air Quality Degradation	Emissions From Generators And Machinery Impacting Indoor And Outdoor Air.	Ess3
Water & Soil Contamination	Spills Of Oils, Chemicals, Improper Material Storage Contaminating Soil/Runoff.	Ess3
Community Health & Safety Risks	Risks To Visitors Due To Open Excavations, Sharp Materials, Construction Traffic.	Ess4
Unauthorized Access Risks	Children, Visitors, Or Community Members Entering Hazardous Construction Areas.	Ess4
Labor Influx Risks	Small Number Of External Workers May Cause Minor Social/Interface Risks.	Ess2
Sea/Sh Risks	Potential Misconduct Or Harassment Involving Workers, Staff, Or Visitors.	Ess2, Ess4, Ess10
Child Labor Risks	Potential Recruitment Of Underage Workers If Contractor Not Monitored.	Ess2
Cultural Heritage Risks	Chance-Finds During Excavation For Sanitation, Walkways, Borehole.	Ess8

These impacts are expected to be **temporary, localized, and reversible**, and can be effectively managed through the mitigation measures outlined in Section 5 of this ESMP.

4.3.2 Operational Phase Impacts

Table 4: Adverse impacts; operational Phase

Impact Area	**Description of Potential Impact**	**Relevant ESS**
Solid & Liquid Waste Management	Continued generation of office waste, cleaning waste, and wastewater; risks of improper segregation and disposal.	ESS3
Water Abstraction Risks	Over-pumping from the borehole may lead to reduced yield or impact nearby users if not monitored.	ESS3
Water Quality Deterioration	Borehole water may become contaminated over time due to poor maintenance or lack of periodic testing.	ESS3

Occupational Health & Hygiene Risks	Poor maintenance of sanitation, ventilation, or electrical systems may compromise staff safety.	ESS2
Fire & Electrical Safety Risks	Expired or unmaintained extinguishers and faulty wiring may cause fires or shocks.	ESS4
Accessibility & Inclusivity Risks	Lack of maintenance of ramps, walkways, or signage may limit access for persons with disabilities.	ESS4
Security Risks	Ineffective fencing, gates, or surveillance may allow unauthorized access.	ESS4
Environmental Degradation	Neglected landscaping may cause erosion, increased dust, or poor drainage.	ESS3
Wastewater & Sanitation Risks	Blockages or malfunctioning sewer lines may create hygiene hazards.	ESS3
Noise & Traffic Issues	Peak operational activities may lead to congestion or noise concerns.	ESS4
Community Interaction Risks	Nearby institutions may raise concerns about noise, parking, or water use.	ESS4, ESS10
SEA/SH & GBV Risks	Risk of misconduct if Codes of Conduct and awareness programs are not sustained.	ESS2, ESS4, ESS10
Regulatory Non-Compliance Risks	Failure to maintain required environmental or OHS records may lead to penalties.	ESS1, ESS3
Maintenance-Related OHS Risks	Slip, fall, or chemical exposure risks from inadequate maintenance.	ESS2

Operational-phase impacts are expected to be **low to moderate** and can be effectively controlled through routine facility management, monitoring, and maintenance procedures.

4.4 Cumulative and Indirect Impacts

Given the confined nature of the sub-project and its location within an existing government compound, cumulative and indirect impacts are expected to be minimal. The project does not induce additional development or land use change beyond the compound.

Positive cumulative effects may arise from improved institutional performance, enhanced water efficiency, and improved environmental management practices that support broader FSRP objectives.

4.5 Residual Impacts

With full and effective implementation of the mitigation measures outlined in the ESMP, residual environmental and social impacts are expected to be **minor and acceptable** within national standards and World Bank requirements. No significant long-term adverse impacts are anticipated.

The overall environmental and social risk rating for the sub-project is therefore assessed as **Moderate**, consistent with the findings of the Environmental and Social Screening Checklist.

5. Environmental and Social Management Plan (ESMP)

5.1 Overview

This Environmental and Social Management Plan (ESMP) translates the findings of the impact assessment into a set of practical, implementable mitigation and monitoring measures to ensure that adverse environmental and social impacts associated with the MoLAH office rehabilitation, landscaping, and borehole drilling activities are avoided, minimized, or effectively managed.

The ESMP is aligned with the World Bank Environmental and Social Framework (ESS1–ESS10), the FSRP Environmental and Social Management Framework (ESMF), and applicable Federal and Puntland State legislation. It applies to both the rehabilitation (construction) phase and the operational phase of the sub-project.

5.2 Objectives of the ESMP

The specific objectives of this ESMP are to:

- Identify and manage environmental and social risks associated with rehabilitation works and borehole drilling;
- Define clear mitigation measures and monitoring indicators;
- Assign roles and responsibilities for implementation and supervision;
- Ensure compliance with national regulations and World Bank ESSs;
- Promote occupational health and safety and community well-being;
- Establish mechanisms for reporting, corrective action, and grievance handling.

5.3 Mitigation and Monitoring Plan

Table 5: Mitigation and Monitoring Plan

Rehabilitation (Construction) phase						
Aspect / Activity (ESS)	**Potential Impact**	**Mitigation Measures**	**Monitoring Indicators**	**Frequency**	**Responsibility**	**Estimated Cost (USD)**
Site preparation & demolition (ESS1)	Soil disturbance, debris	Limit works to approved areas; segregate debris; reuse where feasible	Clean site; waste records	Daily	Contractor	Included in works
Construction & demolition waste (ESS3)	Pollution	Segregate waste; labeled bins; disposal at approved municipal sites	Disposal logs	Weekly	Contractor / Municipality	1,000
Hazardous waste (ESS3)	Health & environmental risks	Impermeable storage; spill kits; licensed disposal	Storage condition; spill records	Weekly	Contractor	800
Dust & air emissions (ESS3, ESS4)	Reduced air quality	Water spraying; cover materials; daytime scheduling	Dust levels; complaints	Daily	Contractor	500
Noise & vibration (ESS4)	Disturbance	Restrict hours; maintain equipment	Complaints	Weekly	Contractor	Included
Wastewater from works (ESS3)	Soil/water contamination	Collect wastewater; no discharge to ground	Drainage condition	Weekly	Contractor	600
Borehole drilling (ESS3)	Groundwater contamination	Approved drilling methods; manage cuttings; water quality tests	Test results	Once / Monthly	Contractor / MoLAH	2,500
Occupational Health & Safety (ESS2)	Injuries	PPE; toolbox talks; first aid; signage	PPE use; incident logs	Daily	Contractor	2,000

Electrical works (ESS2, ESS4)	Shock/fire	Lock-out; certified electricians; signage	Safety checks	Daily	Contractor	700
Community & visitor safety (ESS4)	Accidents	Fence zones; access control; warning signs	Incident records	Weekly	Contractor	1,000
Labor management (ESS2)	Labor violations	Written contracts; no child labor; fair wages	Worker records	Monthly	Contractor	Included
SEA/SH prevention (ESS2, ESS4, ESS10)	Misconduct	Code of Conduct; awareness; confidential GM	Training records	Quarterly	Contractor / MoLAH	1,200
Chance finds (ESS8)	Heritage disturbance	Stop work; notify; apply chance-find procedure	Incident reports	As needed	Contractor	Included

Aspect / Activity (ESS)	**Potential Impact**	**Mitigation Measures**	**Monitoring Indicators**	**Frequency**	**Responsibility**	**Estimated Cost (USD)**
Fire & Electrical Hazards (ESS2, ESS4)	Electrocution; fire outbreaks	Certified electricians only; Insulated cables; Proper temporary power setup; Fire extinguishers onsite	Daily electrical checks; fire equipment availability	Daily	Contractor	700
Chemical Exposure (ESS2, ESS3)	Worker exposure to paints, adhesives, solvents	Store chemicals in ventilated areas; Provide PPE; Train workers; Collect hazardous waste separately	Chemical storage logs; PPE usage records	Weekly	Contractor	450

Ergonomic & Manual Handling Risks (ESS2)	Back injuries; strains	Provide trolleys and lifting aids; Rotate tasks; Manual-handling training	Training attendance; incident reports	Monthly	Contractor	300
Traffic & Vehicle Movement (ESS4)	Accidents involving workers & visitors	Internal speed limits; Designated routes; Flag personnel	Traffic incident log; signage presence	Weekly	Contractor	500
Confined Space Risks (ESS2, ESS4)	Suffocation; toxic gases	Gas testing; harnesses; Standby person; ventilation blowers	Gas-test forms; confined-space permits	Daily	Contractor	800
Working at Heights (ESS2)	Falls, injuries	Approved scaffolding; Fall arrest systems; Ladder inspections	Scaffold inspection sheets	Daily	Contractor	900
Emergency Preparedness Gaps (ESS2, ESS4)	Poor response to incidents	First-aid kits; emergency drills; evacuation plans	Drill reports; kit inspection	Monthly	Contractor	600
Air Quality Emissions (ESS3, ESS4)	Machine emissions affecting workers	Maintain machinery; place generators away from offices; dust suppression	Maintenance logs	Weekly	Contractor	400

Water & Soil Contamination (ESS3)	Fuel/chemical spills	Spill kits; bunded storage; wastewater control	Spill log; soil/water inspection reports	Weekly	Contractor	500
Unauthorized Access (ESS4)	Entry of children or visitors into hazards	Fencing; signage; site security	Access incidents recorded	Weekly	Contractor	300
SEA/SH Risks (ESS2, ESS4, ESS10)	Misconduct, harassment	CoC; SEA/SH toolbox talks; confidential GM	CoC compliance; awareness logs	Monthly	Contractor + MoLAH	1200

Operational Phase

Aspect / Activity (ESS)	Potential Impact	Mitigation Measures	Monitoring Indicators	Frequency	Responsibility	Estimated Cost (USD)
Solid waste management (ESS3)	Pollution	Bins; segregation; municipal collection	Waste records	Weekly	MoLAH	800 / year
Wastewater & sanitation (ESS3, ESS4)	Health risks	Maintain toilets & sewer; routine cleaning	Sanitation condition	Monthly	MoLAH	1,000 / year
Borehole operation (ESS3)	Over-abstraction	Water meter; routine maintenance	Water logs	Monthly	MoLAH	600 / year
Water quality (ESS3)	Health risks	Periodic water quality testing	Test reports	Bi-annual	MoLAH	500 / year
OHS for staff (ESS2)	Workplace hazards	Inspections; first aid; extinguishers	Safety logs	Quarterly	MoLAH	700 / year
Electrical & fire safety (ESS4)	Fire hazards	Wiring maintenance; signage; drills	Inspection reports	Quarterly	MoLAH	900 / year

Accessibility & safety (ESS4)	Exclusion risks	Maintain walkways, lighting, signage	Checks	Quarterly	MoLAH	600 / year
SEA/SH prevention & GM (ESS10)	Social harm	Maintain CoC; GM awareness & records	GM logs	Continuous	MoLAH	500 / year
Water Quality Deterioration (ESS3)	Contaminated borehole water	Biannual water tests; tank cleaning	Water test results	Biannual	MoLAH	500/year
Groundwater Over-Abstraction (ESS3)	Aquifer depletion	Install meter; maintain abstraction logs	Meter readings	Monthly	MoLAH	600/year
Fire & Electrical Safety (ESS4)	Electrical fires, shocks	Quarterly electrical checks; replace extinguishers	Inspection reports	Quarterly	MoLAH	900/year
Accessibility & Inclusivity (ESS4)	Barriers for disabled users	Maintain ramps, signage, accessible toilets	Accessibility inspection	Quarterly	MoLAH	600/year
Security Risks (ESS4)	Unauthorized access	Maintain fences; control gates; security lighting	Security logs	Monthly	MoLAH	700/year
Environmental Degradation (ESS3)	Erosion; dust; vegetation decline	Maintain landscaping; repair drainage	Visual inspections	Quarterly	MoLAH	500/year
Community Interaction Risks (ESS4, ESS10)	Complaints from surrounding institutions	GM awareness; external engagement	GM records	Monthly	MoLAH	400/year
SEA/SH & GBV Risks (ESS2, ESS4, ESS10)	Misconduct	CoC enforcement; SEA/SH awareness	Training logs	Quarterly	MoLAH	700/year
Regulatory Non-	Penalties; non-compliance	Maintain waste, water, and OHS records	Compliance reports	Quarterly	MoLAH	350/year

Compliance (ESS1, ESS3)						
Maintenance OHS Risks (ESS2)	Slips, falls, chemical exposure	Routine inspections; PPE for cleaners	OHS logs	Monthly	MoLAH	500/year

5.4 Capacity Building Plan

Effective implementation of the ESMP requires adequate technical capacity among MoLAH staff, contractors, and relevant stakeholders responsible for rehabilitation works, borehole operation, and facility management. The Environmental and Social Screening identified capacity gaps related to occupational health and safety (OHS), waste management, groundwater protection, SEA/SH prevention, and grievance handling.

The capacity building plan aims to strengthen institutional understanding and practical skills to ensure compliance with national regulations and the World Bank Environmental and Social Standards throughout rehabilitation and operation.

Table 6: Capacity Building Plan

Training Area / Topic	Target Group	Key Content	Frequency	Responsible Institution	Estimated Cost (USD)
ESMP Implementation & Compliance	MoLAH management, facility staff	ESMP obligations, mitigation measures, monitoring & reporting	At project start	MoLAH / FSRP PCU	1,000
Occupational Health & Safety (OHS)	Contractor workers & supervisors	PPE use, working at height, electrical safety, drilling safety, emergency response	Monthly (during works)	Contractor (MoLAH supervision)	2,000
Waste Management & Pollution Control	Contractors, cleaners, MoLAH staff	Waste segregation, hazardous waste handling, wastewater management	Quarterly	MoLAH / Municipality	1,200
Borehole Operation & Water Protection	MoLAH technical staff	Sustainable abstraction, water quality testing, borehole maintenance	Once	MoLAH / Water Authority	800

SEA/SH Prevention & Code of Conduct	All project workers & MoLAH staff	CoC, SEA/SH awareness, confidential reporting, survivor-centered approach	Quarterly	Contractor / FSRP PCU	1,200
GM Operation & Stakeholder Engagement	MoLAH GM focal points	GM procedures, complaint logging, referral pathways	Semi-annual	MoLAH / FSRP PCU	600
Fire Safety & Emergency Preparedness	MoLAH staff	Fire prevention, evacuation procedures, emergency drills	Annual	MoLAH / Municipality	700

5.5 ESMP Budget

Implementation of the Environmental and Social Management Plan (ESMP) requires dedicated financial resources to ensure that mitigation, monitoring, capacity building, and compliance activities are effectively carried out during both the rehabilitation and operational phases of the MoLAH compound sub-project.

The ESMP budget covers costs related to environmental and social mitigation measures, occupational health and safety provisions, waste management, borehole monitoring, SEA/SH prevention, GM operation, and capacity building. Some mitigation measures are integrated into the civil works contract, while others require separate budget allocations under MoLAH's operational and maintenance arrangements.

Table 7 Summary ESMP Budget

Cost Category	**Estimated Cost (USD)**
Construction Phase Mitigation Measures	16,950
Operational Phase Mitigation & Monitoring (annual)	11,350
Capacity Building Activities	7,500
GM Operation & SEA/SH Measures	1,500
Total Estimated ESMP Budget	**37,300**

Budget Sustainability

During the FSRP implementation period, ESMP costs will be financed through the project budget and integrated into contractor obligations and supervision arrangements. Following project completion, routine environmental, health, safety, and social monitoring costs—including waste management, water quality testing, OHS, and GM operation—will be absorbed into MoLAH's

recurrent operational budget and facility management systems, with regulatory oversight provided by MoERCC.

This budgeting approach ensures both effective ESMP implementation during the project lifecycle and sustainability of environmental and social management after project completion.

5.6 Implementation Arrangements

Effective implementation of the Environmental and Social Management Plan (ESMP) for the MoLAH Office Rehabilitation, Landscaping, and Borehole Drilling sub-project requires clearly defined institutional roles, coordination mechanisms, and accountability arrangements throughout both the rehabilitation and operational phases. The implementation arrangements outlined below ensure compliance with national legislation, the FSRP Environmental and Social Management Framework (ESMF), and the World Bank Environmental and Social Framework + 10ESSs.

5.6.1 Ministry of Livestock and Animal Husbandry (MoLAH)

MoLAH is the **project owner and facility manager** and holds overall responsibility for ESMP implementation. Its roles include:

- Overseeing implementation of all ESMP requirements during rehabilitation and operation;
- Ensuring environmental, health, and safety measures are integrated into day-to-day facility management;
- Designating an Environmental and Social (E&S) focal point for the sub-project;
- Coordinating with MoERCC, FSRP implementing structures, and municipal authorities;
- Ensuring operation-phase mitigation measures (waste management, water use, OHS, fire safety) are implemented and maintained;
- Managing the Grievance Mechanism (GM) at the facility level and ensuring timely resolution of complaints.

5.6.2 Contractors (Rehabilitation Phase)

The contractor(s) engaged for rehabilitation and borehole drilling works are responsible for:

- Preparing and implementing a Contractor Environmental and Social Management Plan (C-ESMP) consistent with this ESMP;
- Implementing all construction-phase mitigation measures, including dust control, waste management, wastewater handling, OHS, and SEA/SH prevention;
- Providing workers with appropriate personal protective equipment (PPE) and conducting regular toolbox talks;
- Enforcing a Worker Code of Conduct and preventing child labor and forced labor;
- Establishing and operating a worker-specific GM;
- Maintaining records such as incident logs, waste disposal records, PPE registers, and training attendance;

- Reporting regularly to MoLAH and the supervising engineer on ESMP compliance.

5.6.3 FSRP Implementing and Supervising Team (PCU)

The supervising engineer or consultant provides independent oversight and quality assurance by:

- Monitoring daily and weekly compliance with ESMP mitigation measures;
- Verifying contractor adherence to the approved C-ESMP and World Bank ESS requirements;
- Documenting findings through site inspection reports and recommending corrective actions;
- Verifying closure of non-compliance issues;
- Supporting MoLAH in environmental and social performance reporting.
- Ensuring ESMP implementation is consistent with the FSRP ESMF and ESCP;
- Consolidating environmental and social monitoring reports from MoLAH;
- Providing technical backstopping and guidance on safeguards compliance;
- Coordinating reporting to the Federal PIU and the World Bank;
- Supporting capacity building and GM oversight.

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

MoERCC serves as the **environmental regulatory authority** and is responsible for:

- Conducting periodic inspections to ensure compliance with national environmental laws and permit conditions;
- Monitoring waste management, sanitation systems, groundwater protection, and landscaping activities;
- Issuing corrective action requests and enforcement measures where non-compliance is identified;
- Supporting integration of climate resilience and environmental conservation measures.

5.6.5 Municipal Authorities

Municipal authorities support ESMP implementation through:

- Facilitating solid waste collection and disposal services;
- Supporting sanitation and public health oversight;
- Managing access, traffic flow, and public safety around the compound if required;
- Participating in grievance handling related to community-level concerns.

5.6.6 Coordination and Reporting Mechanisms

Effective coordination will be maintained through:

- Regular site coordination meetings during rehabilitation;
- Routine inspections and joint monitoring visits;
- Clear reporting lines from contractors to MoLAH and supervising engineers;
- Periodic environmental and social performance reports submitted to FSRP structures and MoERCC.

These implementation arrangements ensure that environmental and social risks are proactively managed and that ESMP compliance is sustained throughout rehabilitation and operation of the MoLAH facilities.

5.7 Grievance Mechanism (GM)

A project-level Grievance Mechanism (GM) is established to provide employees, MoLAH staff, visitors, and stakeholders with accessible and trusted channels to raise concerns related to rehabilitation, landscaping, and borehole drilling, environmental performance, labor issues, or community health and safety. The GM is designed to be **simple, transparent, confidential, survivor-centered (for SEA/SH), and culturally appropriate**, in accordance with World Bank ESS2, ESS4, and ESS10.

The GM emphasizes **local resolution at the lowest appropriate level** before escalating complaints further. The following grievance channels will be prioritized:

Primary GM Channels (First Level Response)

1. **Direct reporting to the MoLAH GM Focal Point**, who maintains the grievance register and coordinates timely resolution.
2. **Submission through complaint boxes** placed within accessible areas of the MoLAH compound.
3. **Verbal or written complaints to supervisors, MoLAH management, or safety officers.**
4. **Contractor's worker-specific GM** for labor-related issues and workplace concerns.
5. **Reporting through community representatives or stakeholder focal points** regularly engaged by the project.

All grievances received through these channels must be **acknowledged within 48 hours** and resolved within **7–14 days**, depending on complexity. Resolutions will be communicated back to complainants and recorded in the GM logbook.

Secondary/Escalation Channels (When Primary Routes Fail)

1. If a grievance is not resolved at the MoLAH level, complainants may escalate the issue to:
2. **FSRP Puntland Project Coordination Unit (PCU)**
3. **FSRP Federal NPCU Safeguards Unit** for project-wide oversight

Tertiary / Last-Resort Channel

The **FSRP national toll-free hotline (3060)** may be used **only after all other avenues have been exhausted**, and when a complainant determines that their issue has not been adequately addressed through local project mechanisms. This hotline remains available for confidential and anonymous reporting but is **not the default or primary mechanism** for site-level issues.

SEA/SH-Sensitive Handling

Grievances involving Sexual Exploitation, Abuse, or Sexual Harassment will follow a dedicated survivor-centered protocol:

- No written evidence required
- No confrontation with alleged perpetrator
- Confidentiality guaranteed
- Referral to GBV service providers with consent
- Immediate prioritization and fast-tracked resolution pathways

Institutional Responsibilities

- **MoLAH**: Maintain GM log, oversee resolution, ensure staff awareness.
- **Contractor**: Maintain separate worker GM, report monthly to MoLAH.
- **FSRP PCU**: Oversight, capacity building, and escalated case support.
- **MoERCC**: Review environment-related grievances requiring regulatory action.

Monitoring and Reporting

GM performance will be reviewed during routine ESMP monitoring, with summaries integrated into quarterly safeguard reports and disclosed appropriately.

6. Public Consultation and Disclosure

6.1 Introduction

Public consultation and stakeholder engagement are integral components of the Environmental and Social Management Plan (ESMP) for the MoLAH Office Rehabilitation, Landscaping, and Borehole Drilling sub-project. Meaningful consultation ensures transparency, incorporates stakeholder views into project design and implementation, and strengthens ownership and accountability.

Consultations were conducted in accordance with World Bank ESS10: Stakeholder Engagement and Information Disclosure and national requirements, with the objective of informing stakeholders about the project scope, anticipated impacts, mitigation measures, and grievance redress arrangements.

6.2 Objectives of the Consultation

The main objectives of the public consultation process were to:

- Inform MoLAH staff and relevant stakeholders about the scope and nature of the rehabilitation and borehole drilling activities;
- Identify potential environmental and social concerns related to construction activities, sanitation, water supply, and safety;
- Incorporate stakeholder feedback into the ESMP mitigation and monitoring measures;
- Raise awareness of occupational health and safety measures and SEA/SH prevention;
- Introduce the Grievance Mechanism (GM), including available reporting channels.

6.3 Stakeholders Consulted

The consultation focused primarily on institutional stakeholders and facility users, given that the project is confined within an existing government compound. Stakeholders consulted included:

- MoLAH management and technical staff;
- Laboratory and support staff;
- Facility users and visitors;
- Representatives involved in rehabilitation planning and implementation.

The list of participants and their details are documented in the **attendance sheet dated 18 December 2025**, attached in the Annexes.

6.4 Consultation Methodology

The consultation was conducted through:

- An **on-site consultation meeting** held at the MoLAH compound;
- Verbal presentations explaining the project activities, timelines, and safeguards measures;
- Open discussions allowing participants to raise questions, concerns, and suggestions;
- Documentation of participant attendance through a signed attendance sheet.

The consultation was conducted in **Somali language** to ensure effective communication and understanding by all participants.

6.5 Key Issues Raised and Responses

During the consultation, participants raised several key issues, which have been addressed in the ESMP as summarized below:

Table 8: Key Issues Raised and Responses

Issue Raised	**Name of participant who raised the issue**	**Response / Mitigation**	**Name of Officer/Parent Institution**
Poor sanitation and water scarcity	Mss. Sacdia	Rehabilitation of sewage systems and drilling of a new borehole included in project scope	
Waste management within the compound	Abdifitah	ESMP includes waste segregation, proper disposal, and monitoring measures	
Occupational health and safety during works	Muse	PPE, safety signage, and contractor OHS requirements included in ESMP	
Disruption to office operations	Liban	Works will be phased and scheduled to minimize disruption	
SEA/SH risks during construction	Sacdia	Code of Conduct, awareness sessions, and SEA/SH-sensitive GM included	
Fire and electrical safety	Bile	ESMP includes electrical safety checks and fire safety measures	
GM awareness	Khadar	GM channels and hotline (3060) communicated to participants	

6.6 Disclosure of Information

Information related to the project and ESMP will be disclosed through:

- Display of key project information and GM contacts within the MoLAH compound, and online platforms;
- Sharing of the final ESMP with MoLAH management and relevant authorities;
- Availability of the ESMP at MoLAH offices and, where applicable, through FSRP implementing structures.

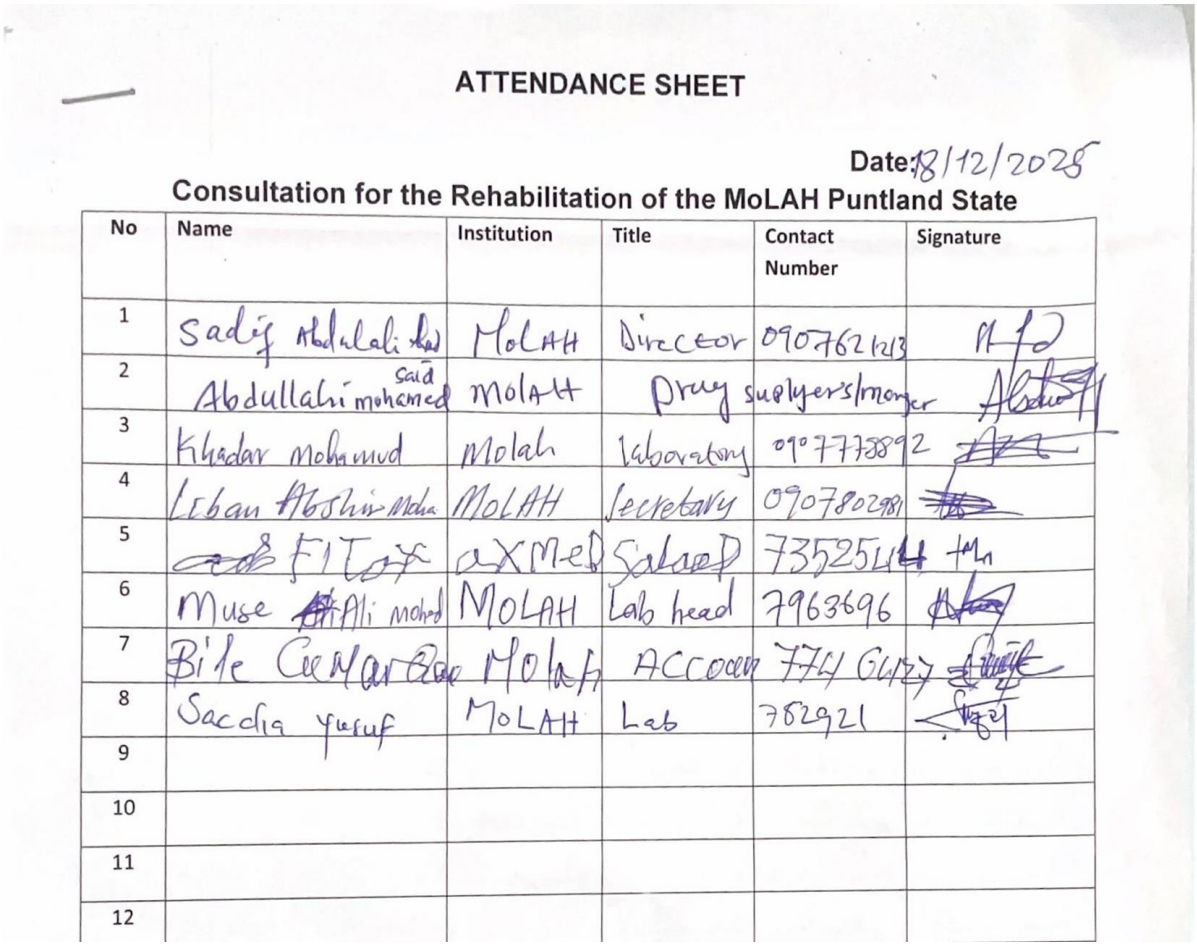
The ESMP will be disclosed in following review and approval by the World Bank.

7. Annexes

7.1. Land documents

The project is rehabilitation of an already existing government building where the headquarters of the MoLAH is operating.

7.2. Attendance sheet



ATTENDANCE SHEET

Date: 18/12/2025

Consultation for the Rehabilitation of the MoLAH Puntland State

No	Name	Institution	Title	Contact Number	Signature
1	Sadiq Abdulahi	MoLAH	Director	0907621213	
2	Abdullahi said mohamed	MoLAH	Drug suplyers/manger		
3	Khadar Mohamud	Molah	laboratory	0907773892	
4	Leban Abshir Mohe	MoLAH	Secretary	0907802981	
5	[illegible]	[illegible]	[illegible]	7352544	
6	Muse Ali Mohed	MOLAH	Lab head	7963696	
7	Bile [illegible]	Molah	Accoun	774 61127	
8	Saadia Yusuf	MoLAH	Lab	782921	
9					
10					
11					
12					

7.3. Consultation Photos

7.4. Site photos

Borehole site

Solid waste in the compound

Limited waste collection containers

Few shrubs that will be removed during borehole drilling

Existing water Berkad for the whole compound.