



International Organization for Migration (IOM)
The UN Migration Agency

Contingent Emergency Response Component (CERC) of the Somalia Urban Resilience Project Phase II (SURP-II)

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Development of Hoodale Site

Land development

Laying of 19.7 km water piping with 1,000 household connections

Construction of 1,000 latrines

Construction of 17.4 km drainage

Widening and compaction of 5.1 km access road

Construction of 1,000 shelters

Installation of 50 streetlights

GAROWE, PUNTLAND SOMALIA

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Prepared by IOM

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Abbreviations and Acronyms

AAP	Accountability to Affected Persons
CCCM	Camp coordination and camp management
CERC	Contingency Emergency Component
CoC	Code of Conduct
CSO	Civil Society Organization
CWW	Concern Worldwide
E&S	Environmental & Social
ESHS	Environmental, Social, Health and Safety
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HDP	High density polyethylene
HH	Household
HLP	Housing, Land and Property
IDP	Internally Displaced Person
IOM	International Organization for Migration
LMP	Labor Management Procedures
MoHADM	Ministry of Humanitarian Affairs and Disaster Management
MoPW	Ministry of Public Works Reconstruction and Housing
NGO	Non-Governmental Organization
NRC	Norwegian Refugee Council
OHS	Occupational Health and Safety
PCU	Project Coordination Unit
PIU	Project Implementation Unit
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SMP	Security Management Plan
SPSL	Solar-Powered Street Lights
SURP	Somalia Urban Resilience Project
SWS	Southwest State
UNICEF	United Nation's Children Fund
WASH	Water, Sanitation and Hygiene
WHO	World Health Organization

1. Introduction

Historical Drought in Somalia. Given the current historical drought in Somalia, it has been estimated that 4.6 million Somalis will face acute food shortages. It is further projected that some 7.7 million people will require humanitarian assistance, and 1,379,000 may be displaced through drought.¹ Based on the estimates of authorities in Puntland, the past three consecutive rainfall seasons, desert locust invasions, the COVID-19 pandemic and inflation have put over one million people in Puntland in jeopardy in regards to accessing to water, pasture, and food. In addition, in November 2020, Puntland was hit by cyclone Gate and an estimated 120,000 people in the Bari region are still recovering from the disaster. The worst affected areas of the ongoing drought are Burtinle of Nugaal; Caluula, Bargaal, Wandala, Iskushuban, Bandarbeyle and Xaafuun and Bela in Bari Region; Xarfo in Mudug and Karkaar.² According to the FGS' needs assessment, the water shortages in coastal areas of Bari, Nugaal, and Sanaag Regions have displaced 10,000 people, mainly women and children and killed many livestock.³

In Garowe's hinterland, droughts lead to a steady growth of IDPs in the urban areas. These meet other groups of IDPs from the southern areas of Somalia that have been escaping conflict. Most IDPs in Garowe have settled in Waberi District. According to UN Habitat, most of the land that was formally allocated by the government for IDP camps located in the southeast part of Garowe. It still lacks proper connection to the urban fabric.⁴ Over 181,962 IDPs were estimated to be displaced in Bari region in December 2021, many of whom are expected to move to Garowe, the administrative capital in Puntland state.⁵

CERC Activation under SURP II. The Component 4 'Support for Urban Forced Displacement' of the Somalia Urban Resilience Project – Phase II (SURP-II) finances approved drought response activities in the three cities of Mogadishu, Baidoa, and Garowe that will likely receive a large inflow of IDPs triggered by the drought. Support will be provided for multiple basic services in (i) water sanitation and hygiene (WASH), (ii) health, and (iii) housing, land and property (HLP) for IDPs, aimed at strengthening government responses to the drought. The implementation of activities will be led by the International Organization for Migration (IOM) in partnership with its partners in the Danwadaag Consortium, which comprise the Norwegian Refugee Council (NRC), Concern Worldwide (CWW) and Gargaar Relief and Development Organization (GREDO). While the CERC activities are implemented under a different modality to ensure timely implementation, the IOM closely coordinates with the existing SURP-II institutional arrangements. IOM has signed an Output Agreement with the federal-level Project Coordination Unit (PCU), which is responsible for the monitoring and supervision of overall CERC activities, while the municipality-level Project Implementation Units (PIUs) oversees the city-level day-to-day activities implemented by IOM and its partners.

ESMP for Hoodale Site in Garowe (Puntland): The Environmental and Social Management Framework (ESMF) specific to Component 4 activities⁶ was prepared to address E&S risks and impacts of Component 4 activities⁷. As per World Bank Guidance (October 2017), the Component 4-ESMF builds on the existing E&S framework instruments for SURP II as much as possible. While the Component 4-ESMF and site-specific ESMPs to be prepared for activities involving civil work are **designed to be as concise and action-oriented as possible to address time-sensitive emergency situations**, they should be read in conjunction with the existing E&S instruments of SURP II, which provide relevant

¹ Drought Response Plan Somalia 2022, p. 3.

² The Government of Somalia, Needs Assessment, March 22.

³ The Government of Somalia, Needs Assessment, March 22.

⁴ UNHABITAT, Garowe Urban Profile, May 2019, p.8.

⁵ IOM, Displacement Tracking Matrix, Drought Analysis 2021, January 2022, p. 4.

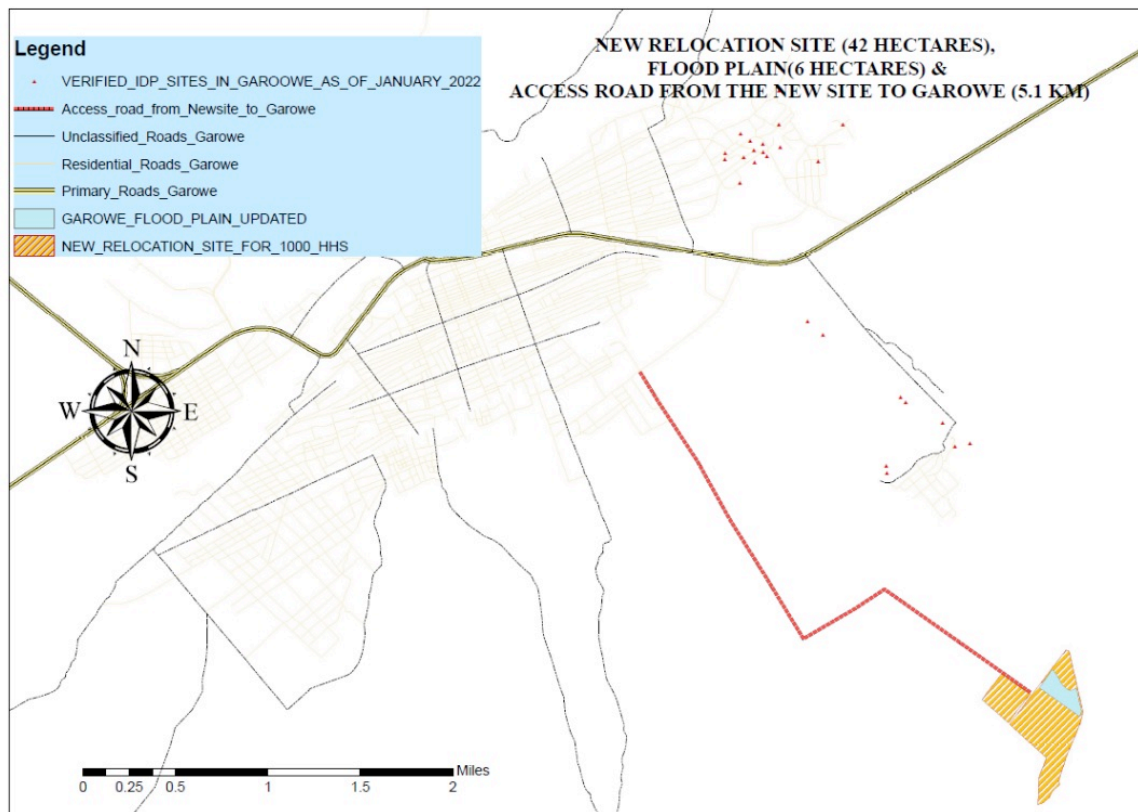
⁶ IOM, Environmental and Social Management Framework (ESMF) for SURP-II Component 4: Support for Urban Forced Displacement', November 2022

⁷ The Second Additional Financing (AF) to SURP II was approved in December 2022, for which the CERC-ESMF was renamed as "the ESMF for Component 4: Response to Urban Forced Displacement" and updated to incorporate the Second AF.

environmental and social baseline information, legal and institutional framework, applicable WB E&S standards and guidelines and gap analysis. As indicated in the Component 4-ESMF, this ESMP for Hoodale site has been prepared to cover activities involving civil works for the laying of a 19.7 km long water piping network with 1,000 household connections, building of 1,000 latrines, land development (bush clearance of the road alignments, drainage and water supply lines), widening and compaction of 5.1 km access road to All-weather gravel road standards, 17.4 km drainage, 1,000 shelters, and 50 streetlights.

2. Subproject Site

Hoodale site in Garowe (Puntland): In Garowe, the activities will target an IDP resettlement site near Jillab. 11,100 IDPs are targeted at the site through the interventions, with ca. 8,7 million USD. Following the decision not to go ahead with original site (Armale), a site called Hoodale with an area of 48 hectares has been put forward by the local authorities as depicted below. However, as per the topographical analysis, it is found out that 6 out of the 48 hectares is a flood plain where no construction should be done. Consequently, the 6 hectares has been handed over back to the local authorities and the remaining 42 hectares has been used for the planned relocation of the 1,000 HHS.



Sources: UN-Habitat Garowe Urban Profile (2019) and IOM Oct. 2022

Figure 2 Map of existing IDP sites in Garowe

The Hoodale site is located at the foothills in the southeastern direction 5 km from the Garowe town. The site has a plateau (approximately 6 hectares) sandwiched between two hills on the southern and northern sides.

E&S baseline at Hoodale

An E&S screening has been performed based on the E&S screening form included in the ESMF of the SURP-II and submitted to the PIU/PCU (Annex 3)⁸. No particular sensitive E&S receptors/risks and impacts were identified through the screening.



Figure 3 Site picture at Hoodale

⁸ See SURP-II Environmental and Social Management Framework (ESMF), Annex 2, accessed at: <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099905106202230917/p1709220447cc30750845e0a3887e0e0eca>



Figure 4 Site picture at Hoodale

The land for construction activities: The Hoodale site is public land with proper documentation showing its tenure status (Annex XXX). The road widening and the water pipelines will not encroach any private land as the proposed alignment follows the right-off-ways of public lands. Regarding the drainages, The drainage networks are constructed inside the Hoodale site, except the outfall channel which takes the collected flood water to the nearby seasonal stream. No physical and economic displacement will occur for the proposed activities.

1. Subproject Design

The Component 4 finances the approved drought response activities in Garowe, which will likely receive a large inflow of IDPs triggered by the drought. Support is provided for multiple activities in terms of basic services in (i) water sanitation and hygiene (WASH), (iii) housing, land and property (HLP) for IDPs, aimed at strengthening government responses to the drought.

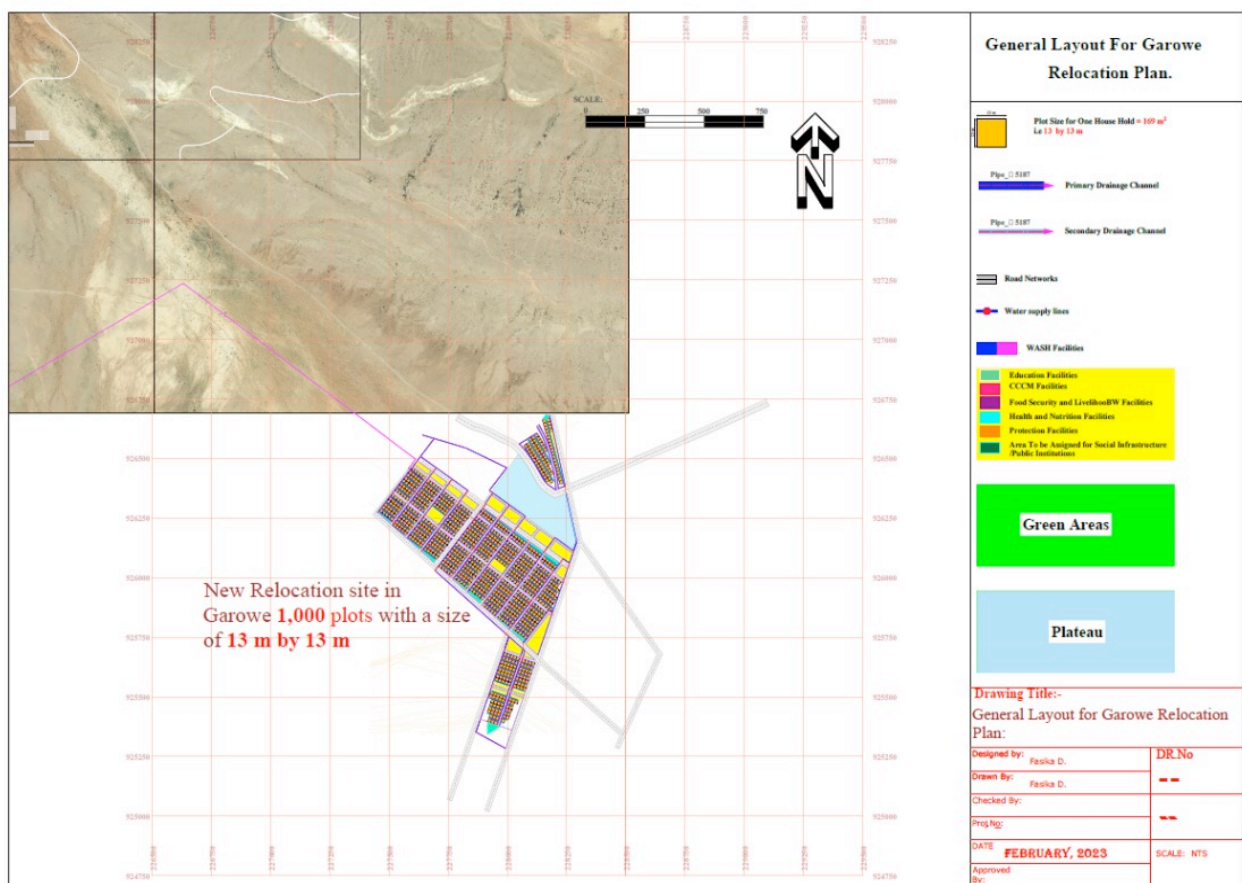
Table 1 Overview of sites

Hoodale site:	
Size	42 hectares
No of HH	1,000
Individual Plot Size	13 m by 13m
Distance from town	5 km
GPS	Long : 48.530499 ; Lat : 8.370091 (for the 42 hectares);
Land Status	Public land with documentation

Project Activities

The proposed interventions will provide essential services for 1,000 households (6,000 individuals) to be settled or relocated to the site. Following the screening process against the positive list and the excluded activities provided in the CERC-ESMF, the site development activities financed by the Component 4 have been determined as follows:

- Topographic surveying
- Site development: Bush clearance and demarcation of the road alignments, drainage and water supply lines.
- Laying of 19.7 km water supply lines (including distribution lines, transmission lines) and connection with the NUWACO (Garowe water supply agency) with 1,000 household connections. i.e. 1 tap per 1 HH.
- Construction of 1,000 latrines (all latrines shall be positioned above the 10-year flood line).
- Construction of drainage facilities (approximately 17.4 km, on either side of the road network).
- Widening and Compaction of 5.1 km all-weather access road.
- construction of 1,000 shelters.
- Installation of 50 Solar-powered Street Lights (SPSL).



The design phase will include the following activities:

- **Topographic surveying and level re-running on the 5.1 km access road:** A local firm will carry out a digital topographical survey of the site with a size of 42 hectares, covering all the features within and outside the boundary of at least a distance of 50 meters from the boundary. Topographic features studied will include gullies, natural/artificial channels, trees of more than 2 meters height, water bodies, adjacent roads and any other distinct feature. The level rerunning shall be done on the 5.1 km access road on public lands. This enables the cut / fill data needed for the design of the all-weather road (30 meters width) which connects the new site with the Garowe city. Both surveys will take a maximum of 10 days.
- **Design of drainage structures** – Primary and secondary drainages with a trapezoidal/ rectangular cross-section will be constructed. This task will be undertaken manually by 100 workers recruited from the local community under IOM supervision and with a specific consideration of vulnerable groups.

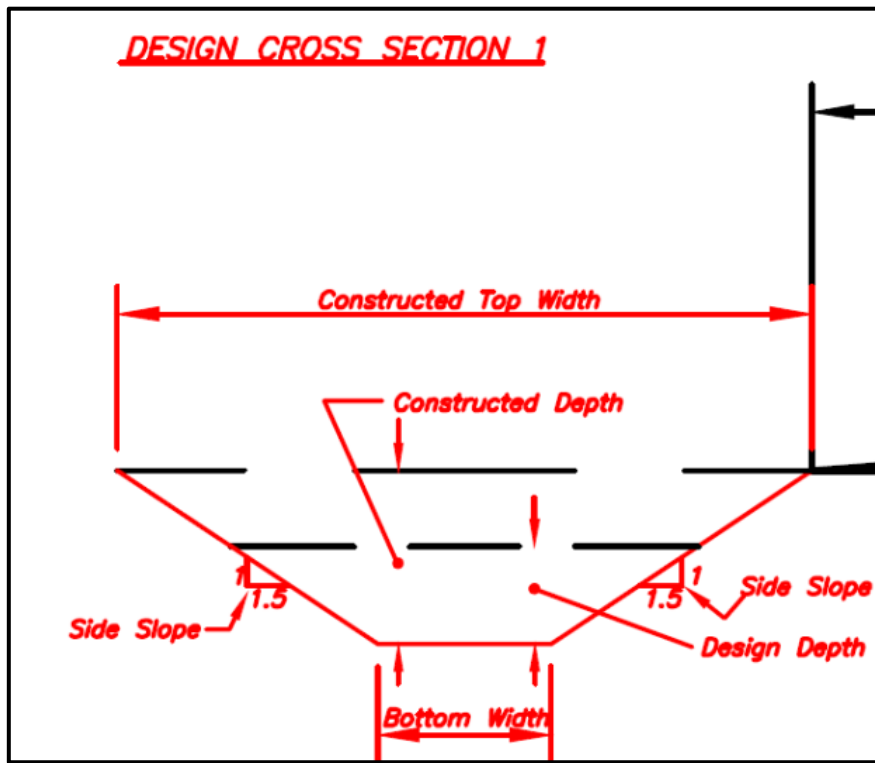
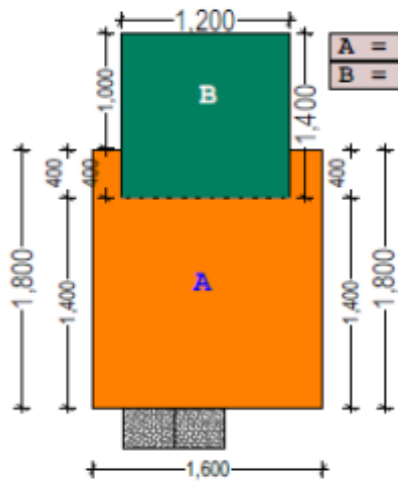


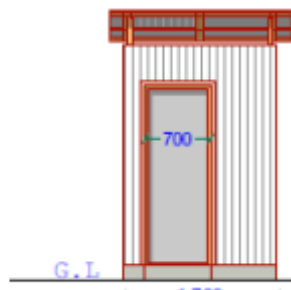
Figure 7 Typical trapezoidal drainage cross-section

- Design of Latrines:** Depicted below is the design of 1,000 gender-disaggregated and lockable single latrines to be constructed in the new site. Latrines will be located inside the 13m by 13m plots of each Household to ensure the safety, especially of women, at night. Latrine design and construction will consider a specific number of latrines to be adapted for disabled and elderly persons. Furthermore, the latrines will provide a disposal location for women's hygiene materials in the form of a separate bin with cover or another suitable option to reduce the density of flies.

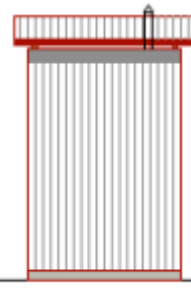


Set-out Plan

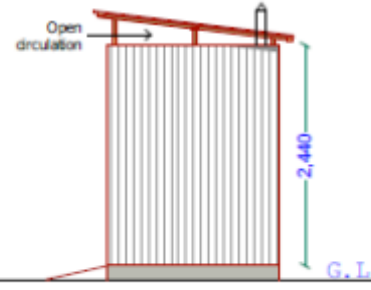
A = Latrine structure
B = Septic tank



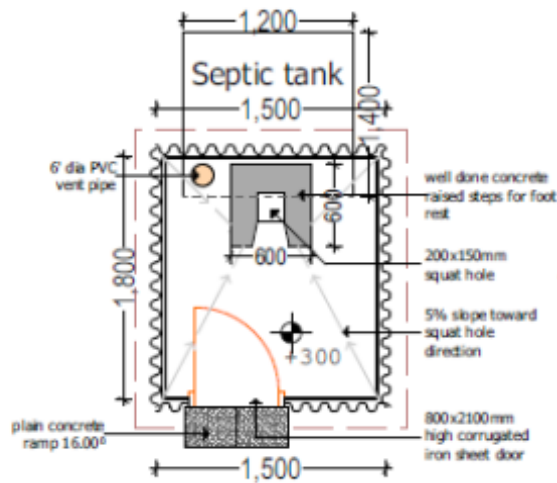
Front Elevation



Rear Elevation



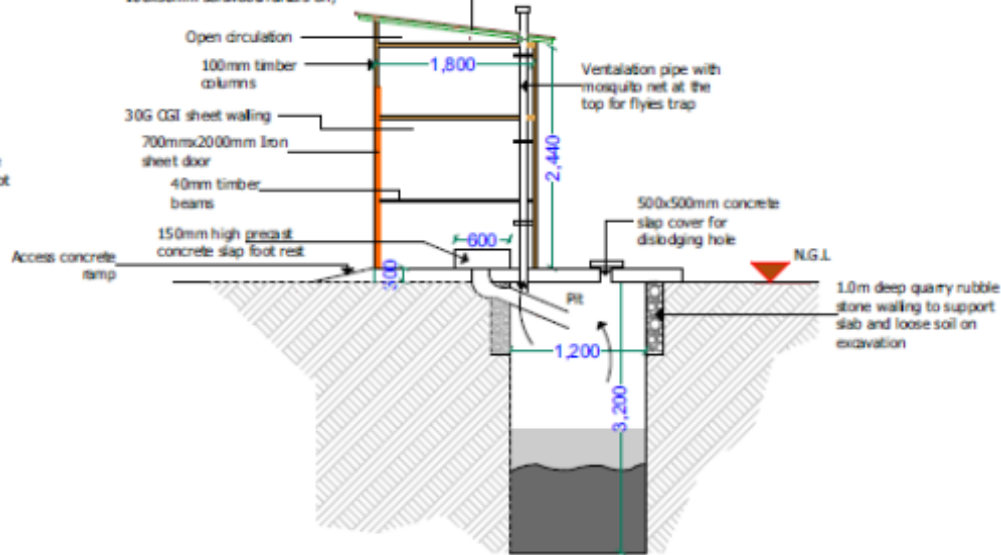
Side Elevation



Floor Plan

Roof Details

Roof slope 23 Half round G.I ridge cap on,
28G GCI sheets on, 50x50mm purlins on,
100x50mm softwood rafters on,



Sectional view

- **Design of shelters:** 1,000 lockable permanent shelters will be constructed via owner-driven approach. NRC will provide all necessary technical guidance and daily monitoring to beneficiaries as well as the labor and local material costs. The beneficiaries will be in their turn doing the actual construction through owner-driven method which will help build their ownership and create work opportunities. Three designs are currently envisaged as seen below:
- **Modality -1:** Hybrid shelter with size of 4.4 m by 4 m which costs around 1,477 \$ as seen below.

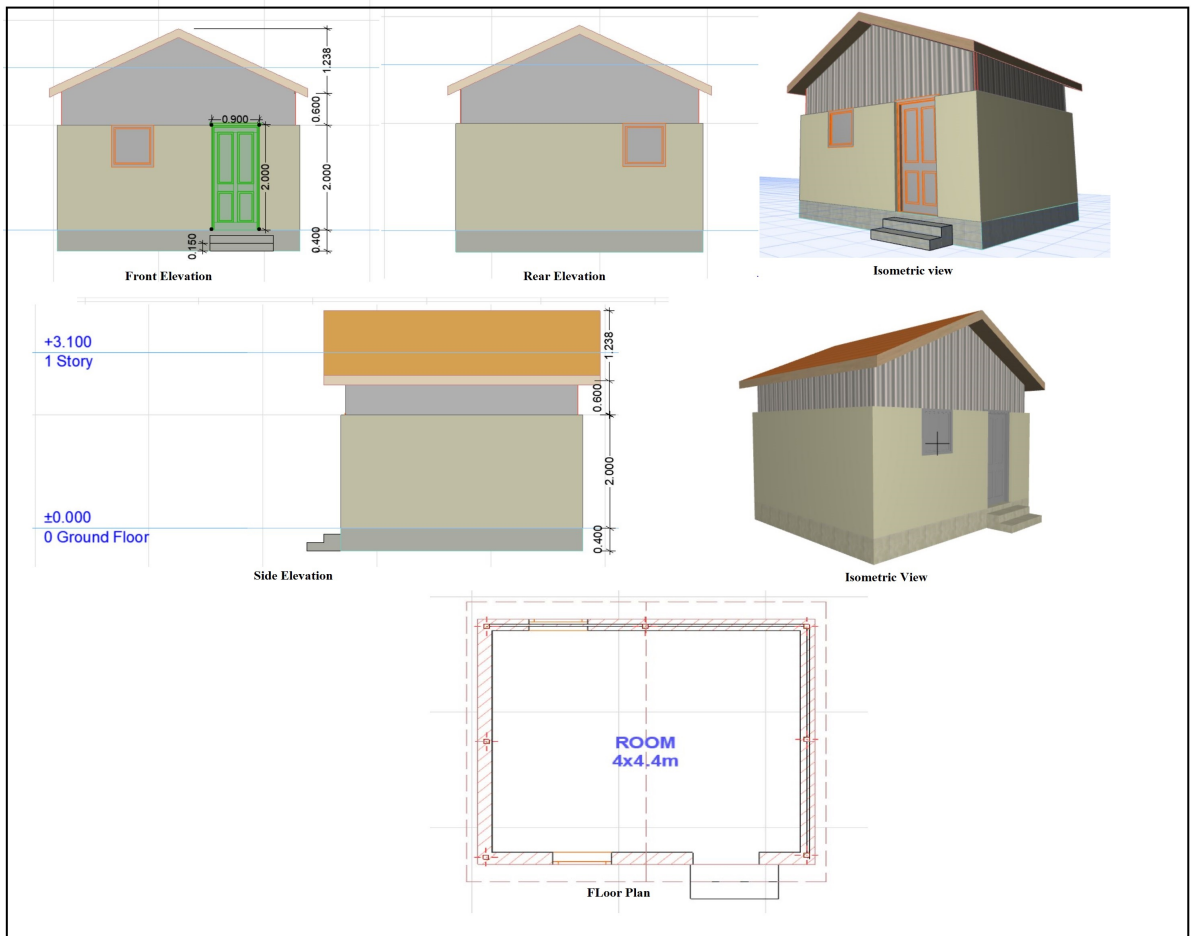


Figure 8 Hybrid shelter with size 4.4. m by 4 m

Modality -2: Hollow block shelter with size of 4 m by 4 m which costs around 1,906 \$ as depicted below.

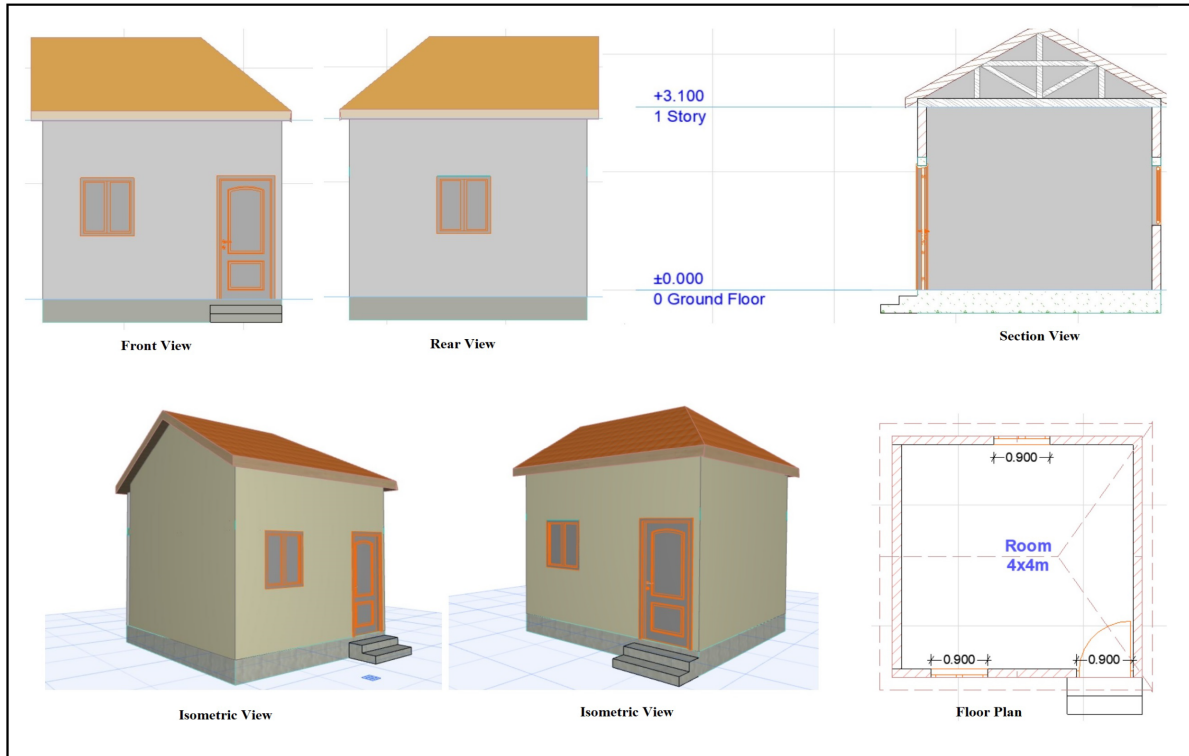


Figure 9 Hollow block shelter with size 4 m by 4 m

Modality -3: Hollow block shelter without plaster and painting, size of 4 m by 4 m which costs around 1,577 \$ as depicted below.

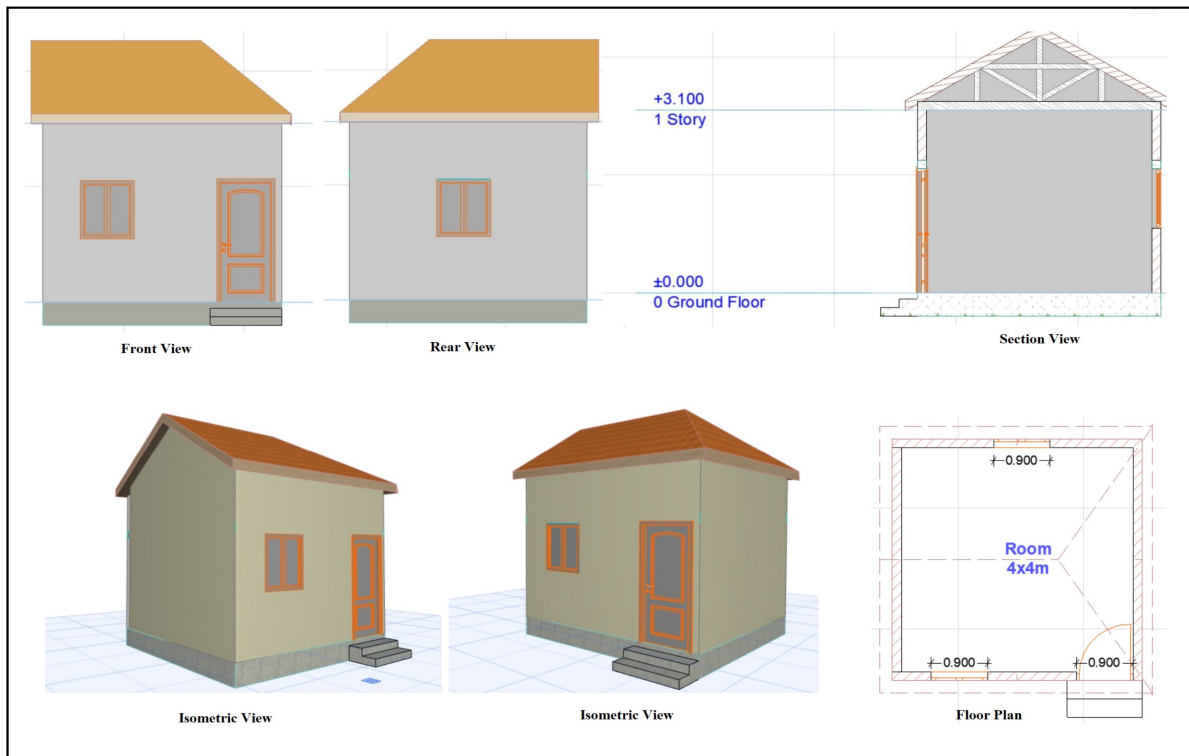


Figure 10 Hollow block shelter without plaster and painting

- **Integration of water supply system:** The water supply system will be integrated with the Garowe water agency (NUWACO) lines. 19.7 km of HDPE pipelines will be laid for the transmission, distribution and connection with NUWACO's lines. The maximum trench dimension is 1.2 m deep by 0.75 wide. The pipelines' dimensions vary from 315 mm to 500 mm. With the exception of the connecting pipes, all the water supply lines are located inside the Hoodale area. The connecting pipes will follow the right-of-way along the public roads as seen in the master plan.
- **Household connections:** Each household will be provided with a private connection.
- **Water pipes:** 19.7 km HDPE pipes for the transmission, distribution and connection lines will be installed. The trench excavation for the pipes' burial does not exceed 40 cm depth and 40 cm width except at the transmission lines where the depth and width can reach up to 1.2 m and 0.75 m respectively.
- **Selection of locations for SPSL:** Due to a limited quantity of SPSL (50 in numbers) to be installed on the vast expanse of the site (42 hectares), they will be installed in the vicinity of amenities like latrines, cross roads to reduce the risk of GBV.

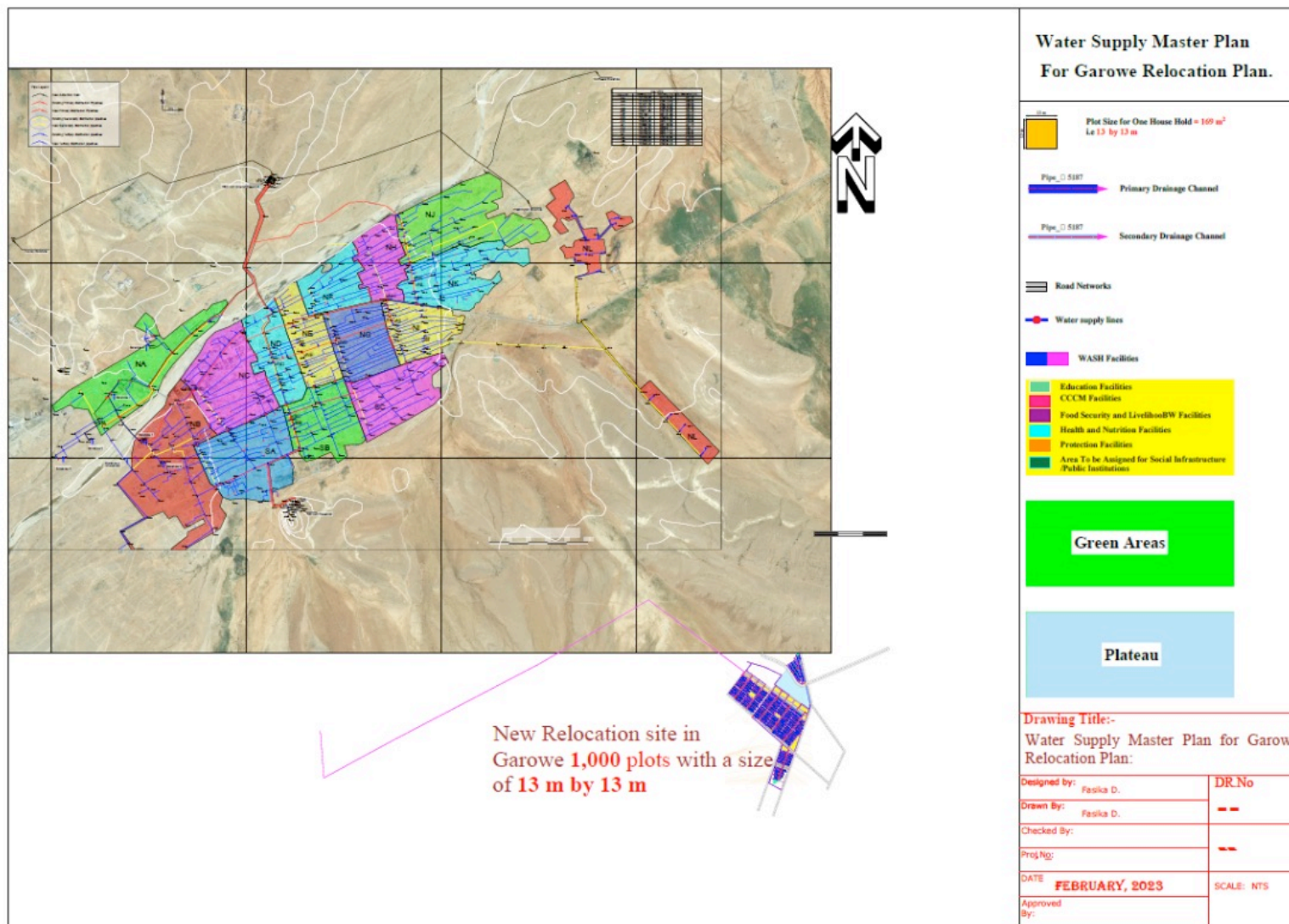


Figure 11 Water supply master plan for Garowe (including the planned new relocation site)

Selection of beneficiaries and recruitment of workers:⁹

- a. supporting the beneficiary selection and relocation to the government site;
- b. support the household-level land demarcation & cadastral survey; and
- c. provide legal support to secure individual land titles.
- d. Recruit female workers

Construction Phase: The works comprise the following:

1. Widening and compaction of 5.1 km all-weather access road.
2. Construction of roadside drainages
3. Construction of latrines
4. Provision and construction of shelter materials sourced from local markets
5. Laying of water piping with 1,000 household connections
6. Installation of SPSL

General Construction Work including but not limited to the following:

Site Clearance of the infrastructure locations

The contractor will bring its own private security escort (to be engaged in accordance with the Security Management Plan) and a minimum of two wheel loaders / bulldozers to execute the bush clearance. Depending on the road profiles, 13 meters – 40 meters width of the roads will be bush cleared which shall also be used for the drainage lines.

The below two activities will be done in sequence:

Activity-1 :

- Clearing any bush/plant remnants from the surface of the road segment as per the site planner instructions.
- loosening / Scooping out the topsoil for a depth of at least 5 cm (five centimeter).
- scooping out any rocky segments near the surface.

Activity-2 :

Following Activity-1, Grading and leveling of the topsoil via the bucket of the wheel loader / bulldozer will be done.

Construction/rehabilitation of pipe culverts, with appropriate inlet and outlet features and scour protection works

Activity-1: Casting and transporting of reinforced concrete culverts with a length of 1.2 meter and inner diameter of 50 cm.

Activity-2: Installation of the culverts at the road crossings. Depending on the road profile, each crossing from 8 m- 20 m wide in span built up over interlocking reinforced concrete culverts, 1.2 m

⁹ See also Section 4 ESMP Tables 2 and 3 which include the participatory, inclusive and transparent selection criteria for beneficiaries and workers. The TOR for recruiting CCCM's OUTREACH TEAM shall be used for worker recruitment.

long, Diameter of 50 cm including construction of a 50 cm sand bagging on either side of the crossings as protection against scouring.

The following equipment will be used during construction:

No.	Equipment Type and Characteristics	Minimum Number Required
1.	Wheel loader / Bulldozer	At least 2
2.	Dump Trucks for overhauling white soils and murrums	From 25 to 50 per day
3.	Grader	1
4.	Compactor	2
5.	Water sprinkler	2
6.	Rented cars for the to and from movement of workers from the project site	5
7.	Hand tools (High density polyethylene HDPE pipe cutter, HDPE pipe jointer...etc.)	Depends on the vendor to be selected
8.	Digging tools for the manual drainage excavation (Pickaxe, shovel, wheelbarrow, spade, 5k.g Stone breaker)	75 each

Material Sites: A well-established quarry at the outskirts of Garowe city (for white soil, murrum, gravel etc..) will be used where suppliers do provide the needs of the contractor.

The following numbers and types of contracted workers are expected:

- **Workers under IOM & NRC:** 100 workers recruited from the local communities to work for at least 90 days at the rate of 7\$ per day. This is for the manual drainage excavation of the drainages (approximately 17.4 km).
- **Workers under the contractor:** For activities like topographic surveying, site preparation, road widening, culvert installation, latrine construction, water supply pipeline installation etc., the contractors shall recruit the workers. The combined work force will not exceed 150.

The contractor will recruit/provide the following workers:

Item No.	Activity	No.	Skilled / Unskilled
1.	Topographic surveying	6	2 skilled chief surveyors and 4 prism men
2.	Site preparation	8	2 operators for the two-wheel loaders / bulldozers and 6 foremen.
3.	Road widening and compaction	10	1 senior road engineer, 1 chief surveyor, 8 foremen.
4.	Culvert Installation	16	1 Engineer & 15 foremen
5.	Latrine construction	50	1 or 2 field engineers, 10 foremen, 40 manual diggers.
6.	Water supply pipeline installation	50	1 water supply engineer, 1 civil engineer, 10 foremen, 40 manual diggers.

Workers Accommodation: As the site is 5 km away from the Garowe city, most of the contractors do not wish to stay at the site after 16:00 hrs. Even most of their specialized workers are likely to be from

Garowe city and have their own residence in the city. It is therefore not anticipated that a workers' camp is required.

The operational phase activities will include:

- Creating awareness on road safety to ensure reduced or no cases of accidents on the roads and ensuring proper road usage by both the drivers and the community.
- Road inspection and maintenance to increase longevity. Drainage inspection and maintenance to reduce or avoid flooding incidences.
- Maintenance of trees and any vegetation planted during the construction phase. When the project team settles on the removal of native vegetation as proposed for land development and construction of the road and the associated drainage, the 'cost' to local biodiversity must first be calculated. Then that cost should be offset with the improvement and protection of a similar site in the neighborhood.
- Maintenance of road signs.
- A water committee from each block will be formed to labor voluntarily in routine cleaning/maintenance of intakes, tanks, and pipelines; prevent vandalism; prevent improper water use; receive training and in turn educate the community members in the maintenance and benefits of the water system in close coordination with Garowe water agency (NUWACO).
- Prevent vandalism of the SPSL components like the solar panel, battery (buried) and anchoring bolts; routine maintenance with IDPs trained by the vendor who installed the SPSL.
- Operations & maintenance of latrines: As per the design, the constructed latrines have a capacity of giving the intended services for at least 2 years without the septic tank filling up. At the end of 2 years, it should be de-sludged and taken to the Waste Stabilization Pond (WSP). However, routine maintenance of the CGI superstructure, cracks on the slab, maintenance of the sandbag after each rainy season is part of the O&M for constructed latrines.

4. Environmental and Social Management Plan

As indicated in the Component 4-ESMF, Table 2 presents mitigation measures to be implemented to address negative environmental and social risks and impacts associated with the general civil works under this subproject. Additionally, Table 3 presents mitigation measures to address specific construction. The tables cover E&S mitigations to be implemented during the **construction phase** as well as the **operational phase**. The implementation of the measures proposed will be **monitored and reported** through the indicators presented in the tables.

This ESMP with the below tables will be attached to local firms' contracts and compliance with its content will be required. The contractors will also have to adhere to the dispositions described in the following sections of this ESMP, such as the labour management procedures, the grievance redress mechanism and the responsibilities and requirements in regard to sexual exploitation and abuse (SEA) and sexual harassment (SH). IOM and its partner NRC and their contractors are also required to comply with applicable national and municipal regulations governing the environment, public health, and safety. The regulations are listed in the ESMF for the SURP-II.

Table 2 Environmental and Social Mitigation Plan for general civil work activities

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
Noise pollution	<ul style="list-style-type: none"> • Restrict construction working hours between 7am to 5pm. • Educate workers on noise reduction measures. • Ensure an effective routine maintenance for construction vehicles and machinery. • Consideration of specific noise control measures for works near sensitive receptors (e.g., schools, health clinics and hospitals, etc.). • Select equipment with lower noise levels, e.g., the use of hand drilling machines. • Install suitable mufflers on engine exhausts and compressor components in cases where the service provider uses generators. • Provide fit for work PPE (ear plug/earmuffs) for all workers involved in the areas with elevated noise levels. • The contractor should use equipment that is/are in good working condition and are periodically serviced. 	Recorded cases of complaints by the project workers and community members
Fire hazards	<ul style="list-style-type: none"> • Provide fire hazard training to construction workers. • Provide fire extinguishers. • Designate areas as “assembly points”. • Establish, where possible, live fire breaks in form of appropriate vegetation. 	# of fire extinguishers installed # of assembly points designated
Air pollution	<ul style="list-style-type: none"> • Educate workers about air pollution impacts from construction activities on human health, and good practices to avoid, reduce and mitigate. • As feasible, minimize the amount of time of areas of exposed soil (source of particulate material). • Sprinkle water on exposed road surfaces as appropriate. • Proper storage of road base materials (e.g., soil, gravel, etc.). • Covering road base material and construction waste soil/material transport trucks with tarpaulin or other heavy material to control dust emission and spillage hazards. • No unnecessary idling during operation of vehicles and machines. • Regular and effective maintenance of construction vehicles and machineries to ensure that they are in good working condition. • No unauthorized slash-and-burn activity. 	# of complaints related to air pollution

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
Water pollution	<ul style="list-style-type: none"> • Educate workers about chemical hazards and safety. • Proper handling and storage of contaminants. • Proper waste management. • Proper soil erosion controls and management • Emergency procedure to control storm water and soil erosion during significant rain fall events or flooding • Careful measures taken not to pollute boreholes, stream and other water sources • Maintain register of any significant releases into surface or ground water 	# of complaints or incidents recorded
Soil pollution	<ul style="list-style-type: none"> • Educate workers about chemical hazards • Proper chemical, material and waste handling and storage • Effective vehicular and machinery maintenance • Maintain a register of any chemical or petroleum spills • Ensure proper site clean-up and closure upon completion of construction 	# of incidents recorded # of grievances registered
Loss of flora and fauna	<ul style="list-style-type: none"> • Minimize unnecessary vegetation clearance • Where vegetation/trees cut down, plant replacement of the same species, and ensure that non-native vegetation are not introduced into the ecosystem. • Sensitize workers about fauna conservation • Discourage fauna killings and set penalties for killing them 	# of trees cut and planted # of grievances recorded Record of sensitization workshops
Generation of solid waste	<ul style="list-style-type: none"> • Educate workers about proper waste collection, storage and disposal • Preparation of waste management plan for each waste stream and implementation of the waste hierarchy • Disposal of project-generated wastes at municipal approved sites only • The contractors shall ensure provision of waste bin at the project sites to handle wastes generated. • Efficient use of materials to as much as possible avoid and minimize waste production and purchase of the right quantities to avoid waste. • Ensure waste are recycled/reused before opting to dispose. • Use of durable, long-lasting materials that shall not need to be replaced often. • Ensure waste is collected and disposed in accordance with Somalia Government regulations. 	# of waste bins at the sites # of waste management plans Volume of total waste generated % of waste collected

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
Occupational health and safety	<ul style="list-style-type: none"> • Select legitimate and reliable contractors through screening OHS records • Address OHS risks with non-compliance remedies in procurement documents. • Proper and effective Contractor OHS plan to be in place that meets applicable Somalia requirements and World Bank ESS2 and World Bank Environmental and Health and Safety General Guideline requirements • The contractor shall always provide the workers with the required PPE and enforce their use while at the work sites. • Provide drinking water • The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality. • Use of safety signage “MEN/WOMEN AT WORK” to warn contractor workers and visitors to worksites. • Provision of adequate signage and communication of risk to workers and communities. • Training and use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards, where possible. • Electrical works should be performed by trained and qualified experts. • Ensure that electrical equipment is properly connected before switching on sockets. • In case of any spillage at working areas, this should be cleaned off immediately, anti-slip hazard warning when mopping floors should be provided to reduce on chances on slip and falls. • Insurance coverage for all project workers • Site construction layout and planning to help minimize potential project OHS risks • Safety induction for workers during induction process • Ongoing OHS training for workers and specialized OHS training for workers with specific risks (e.g., heavy equipment operators, welding, hazardous materials, etc.) • OHS Officer should be on site to implement OHS requirements Proper PPE provided for workers • Provision of sanitary facilities for workers • Separate toilets and change rooms for male and female employees • Worker health screening and monitoring where appropriate • Maintain onsite appropriate first aid and other equipment associated with the level of worker OHS risk, and establish procedure to transport of injured worker to nearby hospital 	<p>Availability of accident logs</p> <p># of first Aid Kits</p> <p># of fire extinguishers</p> <p>Availability of insurance policy</p> <p>% of workers using PPE</p> <p># of trainings conducted</p> <p># of separate toilets for women and men</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<ul style="list-style-type: none"> • Ongoing monitoring and reporting of OHS performance • Proper investigation of all worker accidents or project-related health issues, including documentation of investigation results and as needed implementation of corrective measures • Establish emergency plan/procedure in case of emergencies such as chemical spills, fires, explosions, flooding. 	
Spread of infectious diseases, in particular COVID-19	<ul style="list-style-type: none"> • Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves, and the need to be tested if they have symptoms. • Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing. • All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs. • Mandatory provision and use of appropriate PPE such as masks shall be required for all project personnel including workers and visitors. • Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks. • Avoid congregation of more than 15 workers at one location. Where more than one person gathered, maintain social distancing of at least 2 meters. • Restrict the number of people accessing the work areas. • Fumigate offices and work areas • Train all workers in respiratory hygiene, cough etiquette and hand hygiene. • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the work. 	<p># of reported cases at site</p> <p># of training undertaken</p>
Traffic and Road Safety	<ul style="list-style-type: none"> • Good and effective Traffic Management Plan, including at macro and micro level and consideration of pedestrians • Use of competent drivers with defensive driving techniques. • PIU to regularly inspect vehicle safety and maintenance. • All fleet handling deliveries shall observe speeds limits to a maximum of 80km/h out of major towns but 30kms in the built-up areas in project areas. • All drivers and loaders should sign the CoC. • Drivers (especially going to high insecurity areas) should follow guidance on safe emergency driving. 	<p># of accidents recorded</p> <p># of vehicle inspection reports</p> <p># of trip management plans</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<ul style="list-style-type: none"> • Public notification for planned road closures, road deviations, and construction works. • Information to direct affected local population on potential safety risks from pedestrian movements. • Provide alternative route (detour) if technically and financially feasible. • Take appropriate safety measures, which are technically and financially feasible, to avoid the occurrence of incidents and injuries to members of the public associated with the operation of construction equipment. • Install and maintain traffic and construction signs and controls • Safe driving awareness for construction drivers. • Clearance of road and footpath from construction wastes, materials or equipment. • As appropriate, separation of work areas from public spaces/areas such as barriers, fencing and signs highlighting potential risks or limitations. • In case of project related traffic or pedestrian accident, implement adequate accident investigation procedure (reporting, cause assessment, corrective measures as appropriate, etc.). 	
<p>Poor management of ESHS risks, as well as risks to community health and safety</p>	<ul style="list-style-type: none"> • Establish and maintain continuous liaison with the communities in project areas, including sensitization on ESHS risks and mitigation measures. • Use of local language and images for ESHS signage shall be encouraged. • Ensure proper and adequate provision of sanitation and waste management facilities at all construction sites. • Selected construction staff to be trained on EHS monitoring during civil works. 	<p># of ESHS incidents occurring</p>
<p>Management of chemicals and hazardous Materials</p>	<ul style="list-style-type: none"> • Educate workers about proper management of chemicals, hazardous materials and waste management (use, storage, and waste collection, storage and disposal). • Waste separation and segregation to be undertaken by competent and well-trained staff only. • Provide necessary PPE to workers and other equipment for chemical hazardous material use. • Provide proper storage area for temporary storage of chemicals and hazardous materials. • If pesticides are used, for example for pest control at construction storage area or work camp, ensure not to use any pesticide products that contain active ingredients that are restricted under applicable international conventions or their protocols. 	<p># of waste management plans</p> <p>Volume of total waste generated</p> <p>% of waste collected</p> <p># of trainings records</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<ul style="list-style-type: none"> • Provide waste bins and procedure for collection, temporary storage and disposal of chemical and hazardous wastes including waste oils and petroleum products, batteries, contaminated soil, empty chemical or hazardous material containers, etc. • Disposal of project-generated hazardous wastes at Municipal approved sites only. • Ensure proper clean-up and closure upon completion of work. 	
<p>Labor risks other than OHS: i) labor influx; ii) social tensions; iii) labor disputes over terms and conditions of employment; iv) Child labor risks, and v) Discrimination and exclusion of disadvantaged /vulnerable groups</p>	<ul style="list-style-type: none"> • Implement the LMP including the following (See LMP section for detailed procedures): • Ensure contract has provisions to comply with the minimum age requirements (18 yrs and above) including penalties for non-compliance. The contractor is required to maintain labor registry of all contracted workers with age verification. Verification of the age shall be undertaken prior to the engagement of labor and documented. • The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship. • Project workers recruited from the local communities under cash for work scheme (CFW) will be selected in a participatory, inclusive and transparent manner and well-documented. • Contractually require the contractor to preferentially recruit unskilled labor from the local communities and nearby areas with priority given to hiring of qualified members of project affected households, female community members, local residents and IDPs. • Ensure fair terms and employment conditions consistent with national Labor Code in contracts. • Develop and operationalize grievance redress mechanisms (GRMs) for project workers (direct workers and contracted workers) to promptly address their workplace grievance. • Relevant trainings provided to workers, such as induction and daily toolbox talks outlining expected conduct and local community values, customs and traditions. • Develop remedial procedures to deal with child labor incidents as detailed in the LMP (Where a young looking person's age cannot be confirmed, use the GRC members from the area for age verification; assigning non-hazardous work for the child; employing adult family member; continue to pay the wage without work). 	<p>Labor registry with breakdown information of project workers (age, gender, contact info, etc.)</p> <p># of reported cases of disputes by workers</p> <p>Review of employment contracts</p>
<p>SEA/ SH and other forms of GBV</p>	<ul style="list-style-type: none"> • Implement the SEA/SH Action Plan including the following: • GBV Specialist in IOM available (covering NRC activities as well) for the project implementation and monitoring; 	<p>Progress report of the SEA/SH action plan</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<ul style="list-style-type: none"> • Codes of conduct (CoC) for project workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and SEA/SH provisions, GRM and services available. This will be implemented by the local NRC and IOM teams in Garowe. • Mapping and partnership with identified GBV service providers and development of referral pathways (see Annex 2). • A Reporting and Response protocol that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response (available at Garowe PIU). • An Accountability Framework that outlines how the PIU/contractor will handle SEA/SH allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators. • Establishment of special channel/procedures for safe, confidential reporting of GBV incidence that connect to the project GRM and enable training of GRM operators on how to respond to cases that come forward. • Clarification of GBV requirements in bidding document (including requirements for CoCs, training of workers, and how GBV related costs will be covered in the contract); bid evaluation to include consideration for GBV response proposal. • Arrange enough and suitable toilet and washing facilities, separate from men and women workers. 	<p>% of female workers engaged in each subproject</p>
Security risks	<ul style="list-style-type: none"> • Prepare and implement a security management plans (SMP) in line with ESS4 and WB GPN on the use of security personnel including code of conduct, incident reporting, grievance redress and training/awareness-raising for security officers on the principles of proportionality in the use of force. • Close coordination with security authorities and local communities. • Deploy police officers to provide site security for the workers where appropriate. • Active use of remote monitoring tools, and cautious management of project visibility, e.g., public display of project information such as signboards at works sites. • Carry out consultations in small numbers and also through the telephone when necessary. • Minimize the time spent collecting project-related data and avoiding predictability in the sequencing of data collection locations. 	<p># of reported insecurity incidents</p>
Damage or disruption to tangible and intangible	<ul style="list-style-type: none"> • Chance find procedures will be used as follows: • Stop the construction activities in the area of the chance find. • Delineate the discovered site or area. 	

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
cultural heritage	<ul style="list-style-type: none"> Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums take over. Notify the supervisory Engineer who in turn will notify the responsible local authorities and the Ministry of Culture immediately (within 24 hours or less). Avoid disturbance to local religious and cultural activities. 	
Lack of inclusive stakeholder engagement	<ul style="list-style-type: none"> Implement the stakeholder engagement activities, including the following: Identify disadvantaged groups in each subproject. Establish and maintain continuous liaison with the communities including disadvantaged groups. Facilitate the participation of vulnerable groups to consultations (such as provision of transportation and accessible venues) Establish GRCs involving vulnerable groups. Inform and sensitize all stakeholders on accessible GRM. 	<p>% of disadvantaged groups consulted</p> <p>% of disadvantaged groups in the GRC</p> <p>Functionality of GRM (review of grievance logs and actions taken)</p>

Table 3 ESMP for WASH and HLP activities

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
<p>WASH activities</p> <ol style="list-style-type: none"> Overall withdrawal of groundwater and impacts on other ground water users and other risks (e.g., subsidence) Provision of non-potable water for drinking or other uses Use of chemicals (storage, use, disposal, etc.) associated with water supply and waste water treatment Pit latrines and septic tanks if not well sited and maintained will be a source of 	<ul style="list-style-type: none"> Ensure water balance is determined which will guide on the amount of water to be abstracted, and subsequently eradicating uncontrolled water abstraction by the relevant authorities such as the local council (done) Protect drinking water sources to meet WHO guidelines for drinking water quality. Safe storage and administration of chemicals associated with water supply Keep number of employees handling chemicals to a minimum Ensure proper siting of septic tanks and pit latrines in accordance with the MOH guidelines for siting and construction of pit latrines, including incorporation of roofing and ventilation pipes.(done) Promotion of appropriate latrine design (i.e., above ground, not pit latrines) in areas of high water table. (done) 	<p>Evidence of water balance having been determined</p> <p># of sites where quality of drinking water in accordance with WHO standards</p> <p># of sites where chemicals for water treatment are stored in a lockable storage</p> <p># of sites where construction of septic tanks consistent with MOH guidelines</p> <p># of checklists developed and used to indicate status of WASH facilities</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
<p>foul smell that will affect those within the area</p> <p>5) Faecal matter may lead to underground water contamination if the water table is high or in the case of latrines, when there is an overflow due to heavy rains.</p> <p>6) Contamination of water may lead to outbreak of diseases e.g. cholera, dysentery, typhoid, diarrhea etc.</p> <p>7) Pit latrines can be breeding grounds for flies and mosquitoes, which are disease vectors</p> <p>8) Final disposal of sludge (if removed) from latrines</p> <p>9) Attraction of common pests/disease vectors due to dirty environments, including rats, cockroaches, flies.</p> <p>10) Water quality issues from boreholes</p> <p>11) Exclusion/discrimination of vulnerable groups from accessing WASH facilities, including for persons with disabilities</p> <p>12) Increased community safety and GBV risks if the latrines are not gender-sensitive, especially for women, such as lack of functional locks and night-time lighting.</p>	<ul style="list-style-type: none"> • Ensure proper maintenance of sanitation facilities including cleaning and hygiene training. • Provide hand washing facilities and water in all the sanitation infrastructures. (done) • Ensure and provide training on cleaning of toilet for communities. • Use biopesticides to manage pests. • Precede borehole drilling with proper assessment on location and sustainable yield potential of water in the area. • Ensure continuous monitoring of groundwater quantity. • Introduce point-of-use treatment of drinking water. • Assess horizontal and vertical distance between latrines and drinking water source. (done) • Ensure good siting of latrines so as to not pollute groundwater. (done) • Design treatment technology to reduce pathogen hazard within the sludge by removal to a level appropriate for the intended end use or disposal practice • Dewater and dry sludge disposal at location approved by the municipality • Consider siting and design of WASH facilities to ensure accessibility for all users. (done) • Define GBV requirements and expectations included in the contractual obligations as well as re-enforce CoCs that addresses GBV in the project locations. • Ensure regular consultation with women and key stakeholders including vulnerable groups, persons with disability to facilitate safe access to WASH facilities. • Ensure well-lit, safe and separate WASH facilities for males and females. • Put in place lockable WASH facilities to guarantee privacy and safety for the users. • Conduct regular safety audits to understand the GBV risks and limiting factors that female staff have and may experience in their working and learning environment. • Develop and deliver information, education, and communication materials in Somali language and understandable manner for 	<p># of hand washing facilities provided</p> <p># of checklists developed and utilized to record hygiene status of toilets</p> <p># of trainings on cleaning toilets</p> <p># of sites in which appropriate sludge treatment technologies are used</p> <p># of site in which disposed sludge is dewatered and dried</p> <p>% of workers that have signed a CoC</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<p>stakeholders to indicate that the project and/area is a GBV/SEA/SH free zone.</p> <ul style="list-style-type: none"> • Train all project staff and workers and integrate understanding of the CoC, GBV, SEA/SH as well as accountability and response framework including the referral processes, responsibilities and reporting in other trainings. • Sensitize communities on SEA/SH, services available, GRM including reporting channels. • Put in place a GBV sensitive GRM for project workers and for communities. • Conduct GBV service mapping and establish referral pathways. • Establish a partnership with existing GBV service providers to facilitate safe referrals to services and/or project GRM. 	
<p>Housing Land and Property</p> <ol style="list-style-type: none"> 1) Risk of storm water runoff 2) Risks associated with material supplies for construction and operation (road, truck traffic) 3) Risks of man-made fire 4) Risk of temporary housing failure 5) Risk of flooding 6) Depletion of available wood in the area due to requirements for cooking fuels 7) Demands on environment due to cooking facilities 8) Waste impacts from households leading to community health issues 	<ul style="list-style-type: none"> • Plan and implement the segregation of liquid effluents principally along industrial, utility, sanitary and stormwater categories in order to limit the volume of water requiring specialized treatment • Meet the pretreatment and monitoring requirements of the sewer treatment system into which stormwater discharges • No interference with the operation and maintenance of the collection and treatment systems • Install signage for speed control in front of settlements • Safety/warning signage, safety barrier • Avoid or minimize clearing of vegetation during preparation for works. • Carry out works in areas that have been cleared. • Revegetate around structures following completion of works. • Buildings should use as few resources as possible while meeting cost criteria. Use of renewable resources (e.g. vegetative matter) is preferred over non-renewable (e.g., sheet metal) on the basis of the environmental sustainability of renewable resources. • Encourage the planning for reuse to allow emergency shelter occupant to “carry over” the building materials as assets when they move to their new housing. • Materials which cannot be reused should be recycled. 	<p># Of sites where segregation of liquid effluents is undertaken</p> <p># of sites where the stormwater is discharged into the municipal wastewater treatment system</p> <p># of speed control signage</p> <p># of safety/warning signs have been installed</p> <p># of ha of vegetation cleared</p> <p>% of ha of vegetation rehabilitated</p> <p># of people trained on non-damaging land management techniques</p> <p># of sites with evidence of renewable resources as building materials</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
9) Emergency shelter structures will degrade over time. Resources to make repairs may be taken directly from the environment in an unsustainable manner if not provided by the organization managing the site	<ul style="list-style-type: none"> • Standard soil and water conservation measures should be applied to limit the resource use. • Ensure conducting regular fire drills • Appropriate storage areas for flammable materials • Awareness and sensitization campaign on causes of wildfires/safety practices to adopt • Ensure appropriate training to beneficiaries in the construction of housing 	<p># of sites with evidence of recycling of materials</p> <p># of trainings for beneficiaries on construction of housing</p> <p># of flooding incidents</p>
10) Sewage polluting the environment and being a health hazard for community members	<ul style="list-style-type: none"> • Ensure appropriate elevation of infrastructure to prevent risk of flooding • Incorporate provision of fuel-efficient stoves • Provide training on the use of stoves • Solid waste collection to take place at least weekly, or more often if necessary. 	<p># of households with fuel-efficient stoves provided</p> <p># of IDPs trained on use of stoves</p>
11) Impact of rock or other surface covers (used for shelter base) on water infiltration and drainage	<ul style="list-style-type: none"> • Specific waste collection sites to be established. • Disposal methods to incorporate recycling and composting, managed by community members 	<p># of waste collection per week</p> <p># of waste collection sites established</p>
12) Relocation of IDPs may lead to complaints	<ul style="list-style-type: none"> • Provide resources to IDPs to repair damage to structures through a community-managed approach 	<p># of IDPs provided with resources to repair shelter</p>
13) Land owners have expectations to receive other humanitarian goods in exchange for land	<ul style="list-style-type: none"> • Sewage collection to take place as dictated by local circumstances, including toilet use, ground water levels and surface water inflows. Disposal of sewage to not lead to ground or surface water pollution and should be approved by the appropriate government authority 	<p># of sites with evidence of sewage collection taking place</p>
14) Only male land owners sign leases without consultation of spouses, which can lead to domestic conflict	<ul style="list-style-type: none"> • Buildings should use as few resources as possible while meeting cost criteria and Sphere standards. Use of renewable resources (e.g. vegetative matter) is preferred over non-renewable (e.g., sheet metal) on the basis of the environmental sustainability of renewable resources • Planning for reuse allows emergency shelter occupant to “carry over” the building materials as assets when they move to their new housing. 	<p># of houses with evidence of renewable resources as building materials</p>
15) Conflicts over beneficiary selection	<ul style="list-style-type: none"> • Materials which cannot be reused should be recycled. • Develop a decommissioning plan with community participation • Standard soil conservation measures should be used to limit negative impacts on soil • Implement GRM • Ensure that spouses are also considered as land owners when leases are signed 	<p># of sites with evidence of recycling of materials</p> <p># of sites with evidence of a Decommissioning Plan</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<ul style="list-style-type: none"> • Water used as painter’s wash water or water used for cleaning cement mixers and machinery must be disposed of correctly. • Stringent methods of shelter beneficiary selection will be developed and applied in a participatory, inclusive and transparent manner. 	<p># of sites with evidence of application of soil conservation measures</p> <p># of grievances addressed</p>

5. Labor Management Procedures

The Labor Management Procedures (LMP) for SURP II (updated in April 2022) is applicable to Component 4 activities. This section summarizes key labor requirements of the LMP, highlighting key labor risk mitigations relevant to subproject activities.

Labor use under this subproject. Key project workers under this subproject include the following. The workforce is required for the duration of relevant activities:

- **Direct workers:** Garowe PIU and PCU staff
- **Contracted workers:** (i) the permanent and program staff of IOM (60) and NRC (40), who fully or partially support the subproject; (ii) approx. 150 workers engaged by their contractors (e.g. construction companies for civil works); and (iii) approx. 100 workers engaged by NRC/IOM to work for manual drainage excavation under cash for work scheme (CFW).
- **Primary supply workers:** Workers engaged by primary suppliers who provide goods and materials essential for the subproject on an ongoing basis (e.g. construction materials, materials for latrines).
- **Community Workers.** Ca. 1500 Local IDP community members may support beneficiaries/IDPs who will receive building materials and labor cost from IOM or NRC in setting up transitional shelters with 'owner driven approach'. This type of informal community workforce is categorized under 'community workers' where only relevant and appropriate labor requirements are applied.
- **Government civil servants** (e.g. federal, state and municipal, including police officers).

Key labor risks and mitigations. Key labor risks under this subproject are similar to those listed in the SURP-II LMP, except where the LMP specifically defines risks in relation to road construction. The subproject activities also entail risks of OHS, child labor, labor disputes, GBV/SEA/SH risks, discrimination and exclusion of vulnerable groups, and security risks. Labor influx risks and impacts are less expected, since most works will be implemented by local workforce. The summary of the policies and procedures to address such key labor risks is presented in the table below.

Table Key labor risks

Key labor risks	Policies to address risks	Procedures to back up the policy
<p>1. OHS risks</p>	<ul style="list-style-type: none"> Abide by OHS requirements as set out in Labor Code (Articles 101-104), ESS2 (including general WBG EHSGs), the SURP II LMP and the Component 4 ESMF. 	<ul style="list-style-type: none"> Develop and implement an approved site-specific ESMP, including OHS measures. Select legitimate and reliable contractor through screening OHS records. Address adequately OHS risks with non-compliance remedies in procurement documents. Require the contractor to engage qualified ESHS staffing Enhance workplace OHS awareness and training. Conduct routine monitoring and reporting. Implement COVID-19 mitigation measures as provided in Bank and FGS guidelines Raise awareness on STDs/HIV
<p>2. Child labor</p>	<ul style="list-style-type: none"> Set the minimum age of project workers eligible for any type for work (including construction work) at 18 years. 	<ul style="list-style-type: none"> Include minimum age in procurement documents. Raise awareness on child protection with contractors and in the communities. Maintain labor registry of all contracted workers with age verification. Develop remedial procedures to deal with child labor incidents.
<p>3. Labor influx</p>	<ul style="list-style-type: none"> Minimize labor influx through tapping the local workforce. Minimize labor-related risks on the community through the code of conduct, including GBV. 	<ul style="list-style-type: none"> Require the contractor to preferentially engage unskilled local workforce from the local communities. Make all contracted workers sign code of conduct, including prevention of GBV. Conduct induction and toolbox talks outlining expected conduct and local community values. Introduce disciplinary measures for violations and misbehaviors.
<p>4. Labor disputes</p>	<ul style="list-style-type: none"> Respect the national Labor Code and promptly address workplace grievances to minimize the risk of labor disputes. 	<ul style="list-style-type: none"> Provide workers with contracts with fair terms and conditions. Have grievance mechanisms in place to promptly address workplace concerns. Respect the national Labor Code on workers' right of labor unions and freedom of association.
<p>5. GBV/SEA/SH</p>	<ul style="list-style-type: none"> Implement SEA/SH prevention and response 	<ul style="list-style-type: none"> Conduct awareness raising Enforce signing of code of conduct by all project workers. Train GRC GBV focal point on handling related complaints and also on GBV service providers referral mechanism Require the contractor to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers.

Key labor risks	Policies to address risks	Procedures to back up the policy
6. Discrimination and exclusion of vulnerable or disadvantaged groups	<ul style="list-style-type: none"> Promote no discrimination and equal opportunity with respect to any aspects of the employment relationship. 	<ul style="list-style-type: none"> Require the contractor to employ vulnerable groups as part of unskilled workforce. Provide maternity leave and nursing breaks where relevant. Arrange sufficient and suitable toilet and washing facilities, separate for men and women workers.
7. Security risks	<ul style="list-style-type: none"> Take appropriate and proportionate security measures to minimize the potential risk to the workers. 	<ul style="list-style-type: none"> Security protection to be determined by security authorities to address external security risks (such as terrorism and armed insurgency). Address internal security risks associated with the deployment of security personnel on the community and project workers in line with the WB Good Practice Note “Assessing and Managing the Risks and Impacts of the Use of Security Personnel”.

Minimum age for project workers. The activities will engage IDP community members as project workers to provide them with short-term employment opportunities and support their livelihood, the following policies and procedures will be applied to manage the risk of child labor.

- **Hazardous work:** Considering national and WB requirements, the minimum age for hazardous work under the activities is set at 18.
- **Age verification protocol:** In order to prevent engagement of under-aged labor, all contracts with work contractors shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance, and it will be well communicated to all potential stakeholders including the local community where the unskilled workforce will be sourced. The contractor is required to maintain a labor registry of all contracted workers with age information. Verification of the age shall be undertaken prior to the engagement of labor and be documented. Age verification should be done by: checking the birthday on official documents such as birth certificate, national ID or other credible records, where available; obtain written confirmation from the medical practitioner; obtain written and signed declaration from the worker and his/her parents or guardian; or Inquire with the local community leader, community action group or with other credible community sources.
- **Responsible remedial measures.** In case a project worker who does not satisfy the age limit (18 years old) is identified working on the project, the employer (contractor, subcontractor or primary supplier) shall be required to terminate the engagement of such a project worker in a responsible manner. Indicative responsible approach may include: offer a project employment to a member of the family who satisfies the age limit in exchange of keeping the under-aged worker away from work, if a family member who satisfies the age limit is not available, require the employer (using the contractual penalty provisions) to continue the wage payment to the underage worker without engaging in work for an agreed period, if the worker is over 15 years old and under 18, consider transferring the worker to an alternative position that is not hazardous and does not interfere his/her education (subject to prior risk assessment and regular monitoring).

Terms and conditions for IOM and NRC own staff and consultants. The terms and conditions for direct staff and consultants of IOM and NRC will be governed by their own labor standards, World

Bank's Environmental and Social Standard 2 (ESS 2): Labor and Working Condition, and the national labor code, whichever is more stringent.

Terms and conditions for contracted workers engaged by IOM, NRC and contractors and service providers as well as IDP workers engaged under 'cash for work' program. Key components of the terms and conditions that should be applied to contracted workers under these categories:

- **Provision of written individual contract of employment.** A written individual contract of employment shall be provided to workers that specify the following: (a) name of workers; (b) address, occupation, age and sex of workers; (c) employer's name and address; (d) nature and duration of contract; (e) hours and place of work; (f) remuneration payable to the worker; (g) procedure for suspension or termination of contract. Depending on the origin of the employer and the employee, employment terms and conditions will be communicated in a language that is understandable to both parties. In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.
- **For 'cash for work' (CFW),** all the beneficiaries will sign an MOU/CFW agreement with the IP, witnessed by the CDC representative. The MOU will stipulate the scope of work, output per day, working hours, daily CFW rate, conflict resolution among others. This MOU will formalize engagement of the CFW beneficiaries in the rehabilitation of the selected projects.
- **Notice for termination of contract.** Either of the contracting parties may terminate a contract of employment by giving written notice as under: (a) not less than ten days in the case of manual workers; or (b) not less than 30 days in the case of non-manual workers. No notice needs to be given in case the duration of contract does not exceed one month.
- **Minimum Wages.** The fair market rate will be identified and applied for project workers. For 'Cash for work', in recognition that CFW primarily aims to provide instant, temporary jobs for unskilled labour while rehabilitating community facilities and basic community services, skilled labour is also needed to lead, technically supervise, and ensure the quality of work being done. This means that skilled labour should not receive the minimum wage that the unskilled CFW beneficiaries receive, but rather a fair rate for their daily work. However, at minimum, the minimum wages have to be paid. There is an added benefit when unskilled labourers gaining vocational skills by apprenticeship when they are teamed up with skilled labourers. However, setting wages for CFW projects should take into account: beneficiary needs (i.e. what is the wage intended to cover), objective of the program, wage standards in the project location based on prevailing market rate or government set rate, other NGOs or local actors conducting CFW projects in the same intervention area/cluster recommended rate.
- **Hours of Work.** The normal hour of work of a project worker shall not exceed 8 hours a day or 48 hours a week. Hours worked in excess of the normal hours of work shall not exceed 12 hours a week and shall entitle a worker to a proportionate increase in remuneration, which shall in no case be less than 25 per cent of the normal remuneration.
- Working hours for the 'cash for work' activities are defined as 6-8 hours per day.
- **Rest per week.** Every worker shall be entitled to one day's rest each week, which should normally fall on Friday. It shall consist of at least 24 consecutive hours each week. Workers

shall also be entitled to a rest day on public holidays recognized as such by the Federal and State governments.

- **Annual leave.** Workers shall be entitled to 15 days leave with pay for every year of continuous service. An entitlement to leave with pay shall normally be acquired after a full year of continuous service.
- **Maternity leave.** A female worker shall be entitled, on presentation of a medical certificate indicating the expected date of her confinement, to 14 weeks' maternity leave with half pay, of which at least six weeks shall be taken after her confinement, provided that she has been employed by the employer for at least six months without any interruption on her part except for properly certified illness.
- **Nursing breaks.** A female worker who is nursing her own child shall be entitled, for a maximum of a year after the date of birth of the child, to two daily breaks of one hour each. The breaks shall be counted as working hours and remunerated accordingly.
- **Deductions from remuneration.** No deductions other than those prescribed by the Code or regulations made hereunder or any other law or collective labour agreement shall be made from a worker's remuneration, except for repayment of advances received from the employer and evidenced in writing. The contractor shall not demand or accept from workers any cash payments or presents of any kind in return for admitting them to employment or for any other reasons connected with the terms and conditions of employment.
- **Death benefit.** In case of death of a worker during his contract of employment, the employer shall pay to his heirs an amount not less than 15 days remuneration as death benefit for funeral services.
- **Medical treatment of injured and sick workers.** It shall be the duty of the employer to arrange at his own expense for the conveyance to the nearest hospital of any injured or sick worker who can be so conveyed and who cannot be treated on the spot with the means available.
- **Collective Agreements.** A collective agreement is an agreement relating to terms and conditions of work concluded between the representatives of one or more trade unions, on the one hand, and the representatives of one or more employers, on the other hand. Where collective agreements exist between the employer and project workers, such agreements will be applied, where relevant.

Grievance Redress Mechanisms for Project Workers. While a general GRM will be established for general stakeholders (see below), a separate grievance mechanism will be established for project workers. Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers. Different ways in which workers can submit their grievances should be allowed, such as submissions in person, by phone, text message, mail, email and grievance box. The grievance raised should be recorded and acknowledged within one day. While the timeframe for redress will depend on the nature of the grievance, health and safety concerns in work environment or any other urgent issues should be addressed immediately. Where the grievance cannot be addressed within a reasonable timeframe, the aggrieved worker should be informed appropriately, so that the worker can consider proceeding to the national appeal process. The mechanism will also allow for anonymous complaints to be raised and addressed. Individuals who submit their comments or grievances may request that their name be kept confidential. SEA/SH

grievances from project workers can be reported through any available mechanism and will be handled in a survivor-based manner, as explained in the general Project GRM section.

IOM and NRC staff and consultants. IOM will apply its own internal grievance redress system.

Contracted workers engaged by IOM, NRC and contractors and service providers under ‘cash for work’ program. The project site manager and the ESHS officer (or any other appropriate officers such as E&S focal points) of the contractor and service provider (or IOM and NRC in case of cash for work program) will hold a daily team meeting with all present contracted workers at site at the end of the daily work to discuss any workplace grievances. The grievance raised will be recorded with the actions taken by the contractor and service provider (or IOM and NRC in case of cash for work program). The summary of grievance cases will be reported as part of periodic report. Where appropriate and available, the contracted workers should be allowed to utilize an existing grievance mechanism within the contractor or service provider (or IOM and NRC in case of cash for work program). Where the aggrieved workers wish to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor, the workers may raise their issue with the PIU/PCU and/or the municipality. The contracted workers will be informed of the grievance mechanism at the induction session prior to the commencement of work. The contact information of the PIU/PCU and/or the municipality will be shared with contracted workers.

National appeal process. As per the national Labour Code (Article 134), any individual labour dispute can be submitted by any of the parties to the competent district labour inspector for conciliation, where such labour inspector is available. The inspector is mandated to attempt to settle the dispute within 14 days of its submission.

Contractor management

- **Selection of Contractors.** IOM and NRC shall make reasonable efforts to ascertain that the contractor or service provider who will engage contracted workers is legitimate and reliable entities and able to comply with the relevant requirements under the LMP. Such requirements shall be included in the procurement documents. As part of the process to select the contractors or service providers who will engage contracted workers, IOM and NRC may review the following information:
 - Business licenses, registrations, permits, and approvals
 - Public records, for example, corporate registers and public documents relating to violations of applicable labor law; accident and fatality records and notifications to authorities; labor-related litigations Documents relating to the contractor’s labor management system and OHS system (e.g., HR manuals, safety program); ESHS personnel and their qualification
 - Previous contracts with contractors and suppliers (showing inclusion of provisions and terms reflecting requirements on labor and working conditions).
- **Contractual Provisions and Non-Compliance Remedies.** IOM and NRC shall incorporate the relevant labor management requirements into contractual agreements with the contractor or service provider, together with appropriate non-compliance remedies (such as the provision on withholding 10 % of payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; removal of personnel from the works; or forfeiting the ESHS performance security). In the case of subcontracting, the IOM and NRC will require the contractor or service provider to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.

- **Performance Monitoring.** IOM and NRC shall establish resources and procedures for managing and monitoring the performance of the contractor in relation to the CERC ESMF. IOM and NRC will ensure that the contract with the contractor or service provider explicitly set out their monitoring responsibility for the contractor's performance on labor and working conditions on a daily basis. The monitoring may include, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by the contractor or service provider. Contractors or service providers' labor management records and reports that should be reviewed would typically include the following:
 - Representative samples of employment contracts and signed code of conduct;
 - Grievances received from the community and workers and their resolution;
 - Reports relating to fatalities and incidents and implementation of corrective actions;
 - Records relating to incidents of non-compliance with national Labour Code and the provisions of
 - the LMP; and
 - Records of training provided for contracted workers to explain occupational health and safety risks and preventive measures.

Community Workers. Local IDP community members may support beneficiaries/IDPs who will receive building materials (US\$ 700 in kind) and labor cost (US\$ 300 in cash) from IOM or NRC in setting up transitional shelters with 'owner driven transitional shelter approach'. Following a self-help method, households will be provided with e-cash to purchase materials to build robust, flood resistant shelters that would be able to withstand future recurrences of flooding and provide longer term security to IDPs. The shelters will be built on a government provided plot of land with the help of the affected families. This type of informal community workforce is categorized under 'community workers' where only relevant and appropriate labor requirements are applied. IOM and NRC will ensure that the following measures are taken (relevant measures have been already taken by some IPs, as indicated below): community workers (including those building their shelters) are engaged only on a voluntary basis; the age of community workers should be over 18 as the work entails construction; the OHS training, PPEs and first aid kit are made available to community workers; appropriate wages are paid in timely manner to community workers; GBV risk mitigations are taken for all stakeholders involved in this arrangement (beneficiaries, community workers, and project management staff); GRM is available for community workers.

Primary Supply Workers. When sourcing goods and materials essential for the activities from primary suppliers, the contractor will require such suppliers to identify the risk of (i) child labor/forced labor and (ii) serious safety risks in producing the goods and materials. IOM and NRC will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment and any other relevant due diligence (such as the review of license for quarries). Where appropriate, the contractor will be required to include specific requirements on child labor/forced labor and work safety issues in all purchase orders and contracts with primary suppliers. If child labor/forced labor and/or serious safety incidents are identified in relation to primary supply workers, IOM and NRC will immediately inform the PIU, require the primary supplier to take appropriate steps to remedy them. Such mitigation measures will be monitored periodically to ascertain their effectiveness. Where the mitigation measures are found to be ineffective, IOM will, within reasonable period, shift the project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements.

6. Stakeholder Engagement

Stakeholder identification. As per the Component 4-ESMF, key stakeholders in this subproject include the following:

- **Project affected parties:** Beneficiary IDPs who will benefit from public works; other community members (IDPs or non-IDPs) who will be subject to potential E&S risks induced by subproject activities.
- **Other interested parties:** Community/clan leaders/members, religious leaders, landowners, municipalities of Garowe, federal and state ministries, Project implementing institutions (IOM and NRC), other UN/bilateral donors, international/national NGOs, private sector (water and power utilities), contractors (construction companies) and service providers (health care professionals, lawyers and paralegals) engaged in Component 4 activities.
- **Disadvantaged/vulnerable groups:** IDPs in general, but in particular those with disabilities, female-headed households, widows, elderly, orphans, illiterate persons, minority clans, persons living with severe illness.

Stakeholder Consultations for Hoodale sites: Stakeholder consultations in regards to the planned activities were conducted with a variety of stakeholders, including local authorities and IDP community leaders, members of the host and IDP communities, elders, women and youth groups from host and IDP communities. A focus groups discussion was held with elders on 13 December 2022; a focus groups discussion was held with local authorities and NGOs on 14 December 2022; a focus group discussion was held with women groups on 14 December 2022; and another focus groups discussion was held with youth on 13 December 2022.

Table 4 Consultation Outcomes and Responses

Consulted individual or group	Comment	Response
Local authorities and leaders	<p>The challenges the institutions are facing in providing responses to the affected community are the high expectations of the IDP community and the needs of the IDP, which cannot all be covered.</p> <p>The resources are limited compared to the needs and impacts of the drought. The number of those to be supported is low compared to the needs, and the affected population is huge; the needs and targets are not compatible.</p>	<p>This is noted and the project aims to spend resources in the most strategic way</p>
	<p>Every stage of a construction project has a measurable impact on the environment: the use of raw materials, the transportation of materials from the source to the building site, the environmental footprint of the construction site, the use of water, and waste removal and disposal, all of which need to be carefully planned. If the waste from the construction is not managed critically, it may have a negative impact on the environment.</p> <p>The construction of a new village also brings an expansion of the city toward the pasture area of the city, which may bring a loss of trees and pasture and contribute to further degradation of the environment.</p> <p>During the construction phase of a project, waste management is viewed as the main environmental impact; hence, the project should carefully plan ways to manage the waste of the construction materials. All construction projects generate waste. This can be in the form of builders' rubble, hazardous waste, or general plastic litter and food waste from the workers on site. It is critical that a thorough waste management plan be drafted prior to the commencement of construction.</p> <p>The project will improve the situation of the community by providing proper housing and shelter, latrines and access to water which will have a huge positive impact on the target population's protection.</p>	<p>The team agrees and has prepared the ESMP for this purpose.</p> <p>The Project will ensure that the construction activities do not encroach on trees and pasture. During the topographic surveying, only 3 trees with a height of more than 2 meters have been recorded. And the site plan has taken consideration of them. Regarding the pasture, almost all the project activities are confined within the 42 relocation area, except the transmission line and 5.1 km road, which make use of only the Public right-off-way.</p> <p>The team agrees and has prepared the ESMP for this purpose.</p>

	<p>Water used as painter’s wash water or water used for cleaning cement mixers and machinery must be disposed of correctly. This water is considered hazardous due to the toxins and chemicals it contains.</p>	<p>This is noted and addressed in the ESMP (Section 4).</p>
	<p>If the project selection process is not done in a transparent manner and in accordance with the selection criteria process, it may pose a risk to the community in the process of scrambling for the plots and increase intercommunal tension. Hence, before the selection of the beneficiaries is done, stakeholders and the leaders and community shall be engaged to participate in the selection process.</p>	<p>The Project will implement its Stakeholder Engagement Plan for this purpose prior to the selection of beneficiaries.</p>
	<p>It is suggested that the project be implemented concurrently with tree planting to recover the environmental damages caused by the construction.</p>	<p>This is noted and captured in this ESMP</p>
	<p>Selection of the beneficiaries based on their vulnerability after consulting with local authorities and camp leaders.</p>	<p>The project will follow a stringent process of beneficiary selection in a participatory, inclusive and transparent manner, as clarified in the ESMP (Section 4)</p>
	<p>Women and children affected by drought displacement will have access to shelter; this will enhance the protection of vulnerable people from crimes and violence experienced in IDP settings.</p>	<p>This is noted.</p>
	<p>It is rare for the activities to pose inter- and trans-community disputes, but disagreements over the distribution of resources such as water, street lamps, and other communally shared resources may occur</p>	<p>The project will be implemented in close coordination with local authorities.</p>
	<p>Land boundary dispute for people benefiting from shelter projects.</p>	<p>Any land issues will be handled prior to construction</p>
	<p>The land where the relocation will be done is not in question since the government donated the land and NRC granted the tenure occupancy certificate.</p>	<p>This is noted.</p>

	<p>The newly drought-displaced IDPs are squatters living on land that is owned by private companies and individuals, for whom they don't have the owners' permission, and they are at risk of eviction. Some sites have multiple owners, which escalates the dispute and leads to eviction if the tenant fails to meet the terms of the lease agreement.</p>	This is why the government selected new sites where the land is public.
	<p>The construction work cannot block access to the services, crops, and land livelihoods of the community.</p>	This is noted. The construction activities will not cause any physical and economic displacement, including access restrictions (Section 3).
	<p>Before the start of construction activities, consultations with host communities and IDPs should be done to ensure the transparency. In addition, inform the target beneficiaries selected and what the selection criteria were, as they have high expectations and may not fully understand the selection criteria</p>	The Project team has been implementing stakeholder engagements to ensure all stakeholders are informed and consulted. This will be continued throughout construction
Host and IDP communities: elders and men	<p>The elderly and the disabled shall be considered in the construction, and the construction shall be in a friendly and conducive environment for the elderly and the disabled.</p>	This is noted and designs will be made accordingly.
	<p>Latrines must be accessible to people with disabilities, and distance must favor a disabled girl. Girls with disabilities may be put at risk if a latrine is built at a greater distance than recommended, putting them at risk of GBV.</p> <p>The distance between the latrine and the shelter must be the minimum recommended in the standard sphere.</p>	This has been recognized in the designs of latrines.
	<p>Integration of different activities into the project is necessary for sustainability, and people have ownership of the property shall be given occupancy certificates.</p>	This is noted.
	<p>We need the camp committees to be engaged and part of the selection committees.</p>	The camp committees will be engaged
	<p>The activities can trigger conflicts of interest based on the selection of the beneficiaries.</p> <p>If the activity is implemented in line with the selection criteria and prioritized with the needs of the community, no negative impacts will come from it.</p> <p>If the planned activity is not implemented according to the work plan and selection does not prioritize vulnerability, a potential impact might come.</p>	This is noted and clear selection criteria will be established and communicated in a participatory, inclusive and transparent manner, as clarified in the ESMP (Section 4).

	Frequent community consultation to avoid potential negative consequences of the selection criteria and site identification and documentation.	This is noted and in-depth stakeholder engagements will be conducted.
	Inequitable resource distribution might pose inter- and intra-community tensions.	
	The ownership of the land in Jilib II is not disputed.	This is noted.
	The construction activities will not obstruct access to services; rather, they will facilitate access to services such as water and latrines and allow IDPs to gain access to shelter and land.	This is noted.
	The construction work has an impact on the surrounding area because it will transform a vacant piece of land into a residential area.	This is noted.
	The construction work will change the face of the area, improving the situation of the drought-affected community and promoting access to shelter, security, tenure, and land.	This is noted.
Host and IDP communities: women		
	In comparison to the previous environment, where women and girls were spending time under a makeshift tent, the women will have a more conducive environment free of security risks.	This is noted.
	The women shall be engaged in the decision-making process during the implementation of the activities.	Stakeholder engagement has been engaging women and will continue to do so.
	The potential social impact of the planned activities is that women and girls may not be aware of GBV risk if there is no awareness raising. So, the project shall assess any possible risk before implementation.	GBV risks have been assessed and prevention and mitigation measures established.
	They may create conflict between the community and the government due to the limited number of people to be supported.	Clear beneficiary selection guidelines will be prepared and communicated.
	The ownership of the land is not in question, and it has been donated by the government of Puntland.	This is noted.
	The construction activities will not block access to the services, thereby improving access to them.	This is noted.
	Latrine separation and the installation of solar lights near the latrines for the safety of the girls and women. The shelter shall have an inner lock to promote the privacy of the girls. Build a water station at the community center in public places where everyone can use it for free.	This is noted and will be implemented.

	The women and girls are at risk of GBV since the houses may not have a permanent and lockable house.	This is noted and designs for houses already include locks.
Youth groups from neighbouring IDP camps and host communities	There are no environmental impacts that activities have; they are accessible to the communities, both host and IDP, and we believe the activity will improve the environment.	This is noted.
	Conflict of interest: The camp leaders and authorities might favour some individuals who are related to them in the selection process if they are unreliably carrying out the process.	A clear beneficiary selection process will be established and communicated. In addition, a Grievance Redress Mechanism will allow anyone to file a grievance.
	The selection shall be inclusive such that the host, IDPs, youth, elders, women, and PLWD participate in the selection process.	
	The project only supported a limited number of beneficiaries but the needs of the IDP and host community are high; therefore, it might pose conflict or disputes between the two communities.	A clear beneficiary selection process will be established and communicated. In addition, a Grievance Redress Mechanism will allow anyone to file a grievance.
	No, the ownership of the land is not in dispute.	This is noted.
	The construction activities will not block access to services, but rather they will allow access to the resources, and even other humanitarian organisation will put their focus on it to make sure a durable solution is relied on.	This is noted.
	Because the Hoodale II land is far from Garowe town and the IDPs rely on the host community in Garowe, we urge the NRC to provide transportation services or change the drought solution and purchase land within Garowe town for a durable solution.	The land was selected by the government. Solutions for transportation will be discussed.
	Construction of a school, health center, and police post is required to ensure security is maintained in the area before relocating the people to the sites	Security will be provided by the local formal security services.

Stakeholder engagement programs for this subproject: Throughout the preparation and implementation of activities, the project team of IOM and NRC will continue to conduct inclusive stakeholder engagement in project sites. Stakeholder consultations allow community members and other stakeholders to assess and identify additional risks and impacts, as well as risk mitigation measures. As per the Component 4-ESMF, inclusive consultations will be conducted during all phases of activities (preparation, construction/operation and maintenance phases). All stakeholder engagements will follow the guidelines provided by the World Health Organization (WHO), the Ministry of Health of the Federal Republic of Somalia (FRS) and the WB to mitigate the risk of COVID-19 transmission during stakeholder engagement activities. Stakeholder engagement was conducted during the planning phase of the interventions. The next round of stakeholder engagements will be conducted during construction. The GRM mechanisms available (see below) will further allow for continuous feedback and communication with concerned stakeholders.

Strategy to incorporate the view of vulnerable groups. All views expressed by stakeholders are carefully noted, documented in the consultation summary and considered, including those of disadvantaged or vulnerable groups. To support this, such groups are identified during site-specific project preparation and appropriate measures are considered through close consultation with such groups and support groups in order to incorporate their views into the project. Like under the SURP II, IOM and IPs provide vulnerable groups with appropriate incentives and accommodation, such as accessible venues and transport and sitting allowance, to participate in stakeholder consultations to be carried out in culturally appropriate manner. Vulnerable community members will also be provided with the opportunity to express their views privately, such as in separate focus group discussions or phone interviews for female stakeholders and other vulnerable IDP members. Easy-to-understand, non-technical language and materials will be used during the consultations with illiterate stakeholders. The targets and indicators for inclusion of vulnerable groups indicated in the ESMP tables of this ESMP will be monitored and its effectiveness reviewed as part of periodic monitoring and reporting processes.

Disclosure: Meaningful stakeholder engagement depends on timely, accessible, and comprehensible information. All relevant documents, including this ESMP, will be fully disclosed in local language in areas accessible to project-affected parties and on the website of IOM, NRC and WB. Formats to provide information may include presentation printouts, non-technical summaries, project leaflets, and pamphlets, depending on stakeholder needs.

7. Grievance Redress Mechanisms

IDPs and host communities will be informed about the grievance redress process in the course of community engagement activities. The summary of registered grievances and actions will also be made public. Handling of grievances is discreet, objective, sensitive and responsive to the needs and concerns of the beneficiaries. The mechanism also allows for anonymous complaints to be raised and addressed. The aggrieved person also has the option to resort to the formal judicial system. Individuals who submit their grievances may request that their name be kept confidential.

The SURP-II GRM is already in place in Garowe. The current SURP-II GRM will be available and open for case registration for the Component 4 activities on the Hoodale site. At the same time, however, IOM will implement its own GRM, which specifically targets aggrieved individuals in and around the Hoodale site. This section describes both GRM.

SURP-II GRM: The current Project GRM consists of a three-tier grievance system. Other than in person reporting, available channels are: Telephone number: +252 (0) 907 790575; +252 (0) 907 747496; email address: mgure.suipp@plstate.so; hotline number: 372

- **Site-level GRM (Tier 1 GRM):** A grievance redress committee (GRC) has been established in Garowe and consists of representatives from women and youth groups, elders, religious leaders, representatives from the PAPs, and representatives of the municipality. The mechanism takes into consideration the existing local practices.
- **Municipality-level GRM (Tier 2 GRM):** The municipal-level GRM already exists under the SURP-II. It addresses unsolved grievances at the site-level GRM. The municipal-level GRC is comprised of the representatives of each municipality and the PIU and the representatives of the aggrieved persons/communities.
- **Federal-level GRM (Tier 3 GRM):** The exiting federal-level GRM addresses unsolved grievances at the municipality level, which may require higher-level solution or common issues across municipalities participating in CERC activities. The federal-level GRC is formed by the Project Coordination Unit (PCU) at the Ministry of Public Works, representatives of relevant municipalities, and other relevant federal ministries and agencies.

IOM's GRM. IOM has been applying an 'Accountability to Affected Persons (AAP)' mechanism. The AAP is based on a) participation, b) complaints and feedback mechanism (CFM), and c) Information sharing and transparency. AAP contains GRM, but also the involvement of the community in the design and implementation of activities and feeding back information and learning to the communities. Where the use of the existing GRM under SURP II is not optimum (in particular Tier-1 GRM), the CERC allows the continuation of IOM's GRM as Tier 1 mechanism. However, IOM will form a new GRC, consisting of IDPs local administration representatives, and the CFM Focal Points to ensure that IOM grievance redress is inclusive. NRC activities will also rely on IOM's mechanism. The steps of IOM's GRM, otherwise, will be maintained:

- Operation through two CFM focal points. These individuals will be trained on how to record complaints and provide information request response, in addition to referral pathways and specialized trainings from GBV partners on sensitive case referrals. These individuals will ensure the provision of information on the GRM (including written pamphlets), focusing on vulnerable groups as well, and record complaints using the standardized intake form which is provided by the CCCM cluster. Grievances can be raised, recorded and addressed anonymously. Once this form is complete, it can either be photocopied for referral purposes to service providers or filed safely in IOM's office. One of the CFM focal points should be a female staff member to encourage participation from female beneficiaries.
- When setting up a CFM desk for a day, it is important that half of the day is located at a fixed desk, with the other half of the day desk operators are mobile inside of the site. The fixed desk will be set up at the location where construction activities take place at the respective day. Hence, the desk will be shifted. This will allow the focal point to deliver complaints information to individuals who have recently filed complaints, as well as allowing for access to individuals who may not be able to reach the fixed desk. Lastly, this person should be wearing designated CFM visibility which also displays the logo of the CCCM partner. This CFM logo should be circulated with the community so that they are able to associate that logo with the CCCM partners CFM system. In addition to the desk, a hotline number is available: 461.
- Once a complaint has been filed, data should be compiled using an intake form with informed consent being obtained from the individual making the complaint. The CFM focal point and/or other members of staff will now work on contacting service providers according to the

complaints that have been registered. A referral form/or copy of intake form/detailed email with necessary data will be filled out for each complaint and sent via email to the respective focal point with follow up done via mobile phone. IOM CFM staff should obtain a response from the service provider about how they are going to rectify a raised complaint within 14 days. Indicative timeline for the escalation process is provided in Table 12 below. Where inclusive decision making should be applied the newly formed GRC will be consulted.

- Information related to how a service provider is going to remedy a complaint will be provided to the individual who has made a complaint based on how they'd like to best receive feedback. When submitting a complaint, individuals have the option of stating how they want to be informed by the CCCM partner on the overall response to the complaint (mobile phone or home visit). Staff has capacity to take remedial actions.
- Once a service provider has fully addressed a specific complaint, details regarding the action should be provided to the community member who originally raised the said complaint. If satisfied with the outcome, the case will be changed from pending to close. Once this has been done, the CFM staff member will upload the complaints data using the cluster's standard kobo form. CFM data will be linked directly to the CCCM cluster via the use of a central CFM database/ODK account. This data will be displayed using power bi on a separate CCCM website which will allow for stakeholders to disaggregate data and information related to particular sectors, geographic location and demographic making complaints. This data will also be showcased within the CFM database that is created through the kobo data that has been submitted. IOM to upload complaints data using the cluster provided Kobo form for all cases that are closed, or cases that have been open for more than 14 days. IOM will have the ability of accessing their uploaded complaints data via Kobo and will have the ability to alter the status of a complaint in addition to the satisfaction of the complainant.

The PIU project team and IOM aim to address grievances with the following steps and indicative timelines:

Table 12 Steps and timelines for grievance redress

Number	Steps to Address Grievance	Indicative Timeline	Responsibility
1.	Receive, register and acknowledge complaint in writing	Within 1 day	IDP site-specific GRC ¹⁰ supported by IOM/NRC
2.	Screen and establish the basis of the grievance; where the complaint cannot be accepted (e.g. complaints that are not related to the project, the reason for the rejection should be clearly explained to the complainant	Within 3 days	IDP site-specific GRC supported by IOM/NRC
3.	GRC to consider ways to address the complaint	Within 3 days	IDP site-specific GRC supported by IOM/NRC
4.	Implement the case resolution or the unsatisfied complainant can seek redress through the appeals process	Within 3 days	IDP site-specific GRC/ Municipal GRC/Federal GRC in case of appeal
5.	Document the grievance and actions taken and submit the report to PIU/PCU	Within 3 days	IDP site-specific GRC supported by IOM/NRC
6.	Elevation of the case to a national judiciary system, if complainant wishes to do so	anytime	IDP site-specific GRC supported by IOM/NRC

¹⁰ IOM CCCM has a conflict resolution committee which is part of the CMCs (Camp Management Committee).

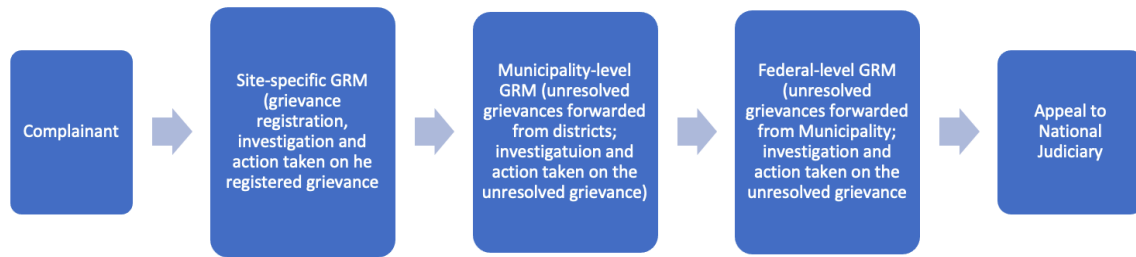


Figure 12 GRM organigram

Grievances related to Gender Based Violence (GBV). To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the grievance mechanism has a different and sensitive approach to GBV cases. The GRCs will have a female member trained in dealing with GBV grievances. The member will be supported by GBV specialists/focal points engaged by IOM and NRC. The PCU has a GBV specialist already in place, who will also closely work with GBV specialists/focal points of IOM.

Where a case is reported, actions taken will ensure confidentiality, safety and survivor-centered care for survivors. Any survivors reporting through the GRM, should be offered immediate referral to appropriate service providers based on their preference and with informed consent, such as medical and psychological support, emergency accommodation, and any other necessary services. In SURP-II, appropriate GBV service providers mapping has been conducted and working relationships established. In Garowe, GBV service providers have been mapped by the PIU. Details are attached in Annex 2.

The GBV service providers are expected to refer project related survivors of GBV to the project GRM according to their wishes. GRM operators will be trained on the empathetic, non-judgmental and confidential collection of these complaints. Project workers will also have the right to lodge complaints related to SEA/SH through the GRM, with any supervisor at any level or directly with the PCU (GBV Specialist). Only the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered. The preference of the survivor will be recorded and the case will be considered closed. Recorded GBV/SEA/SH cases should be reported to the World Bank project team within 24 hours.

IOM/NRC: IOM has a GBV Specialist consultant for the implementation of the Component 4. It will identify and seek to address GBV through deliberative dialogue sessions that will be facilitated during community-based planning to ensure that the safety, dignity, well-being and equitable access to services, especially women and girls, is prioritized, integrated and coordinated across all partners. This will create safe spaces for: (a) mitigating risks: by mitigating the risk of GBV in activity planning and doing no harm; (b) supporting survivors: by facilitating access to survivor-centered, multisectoral services; and (c) addressing the root causes: by contributing towards progressively transforming the conditions that perpetuate GBV.

8. Monitoring and Reporting

The PIU will conduct monitoring of the activities, including environmental and social risk mitigation measures and compliance with this ESMP and its indicators. Review of documentation and field monitoring will be undertaken on a monthly basis. The PIU will report monitoring observations and results to the PCU. In cases of non-compliance, the PIU will require IOM and NRC to take corrective measures to bring activities back to compliance. The IOM may consider engagement of third-party monitoring (TPM) to supplement its monitoring activities. The lessons learned from the findings of TPM for the parent project to date will be also considered in the implementation of this subproject, which includes contractor management, OHS, labor and working conditions, inclusion of vulnerable groups, GBV and functionality of the GRM.

IOM will prepare joined monthly reports, including inputs from the Contractor on the status of implementation of the ESMP to the PIU. Details of these reports and their content are given in the Table below.

Table 5 E&S Monitoring and Compliance Report

#	Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
1.	E&S Progress Reports	Compliance status of the sub-project with the environmental and social mitigation and monitoring measures laid out in this ESMP and status of design phase.	Monthly	Contractors and NRC to IOM
2.	E&S Monitoring Report	E&S Updates	Informal meeting / monthly	IOM to PIU/PCU
3.	E&S Progress Report	Contribution in regard to sub-project to compliance status of overall Project with E&S requirements	Quarterly	IOM to PCU
4.	Incident Reports	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to address the future recurrence of this event	Initial investigation report for severe incidents within 24 hours. Detailed Investigation Report within ten days	Contractor/ Service provider/ IOM/IPs with support of PIUs/PCU

9. Roles and responsibilities in implementing & supervising the ESMP

Overall institutional arrangement: The proposed Component 4 activities will be implemented under the overarching umbrella of the SURP-II institutional arrangements. The SURP-II PCU, embedded in the Ministry of Public Works Reconstruction and Housing (MoPW) at the federal level has the overall

responsibility for the monitoring and supervision of all CERC activities, including environmental and social risk management. The established Project Implementation Unit (PIU) in Garowe will support the day-to-day supervision and monitoring of compliance with all mitigation measures for this specific subproject. The PCU and the PIU will also coordinate with the Ministry of Humanitarian Affairs and Disaster Management (MoHADM) within Puntland, and the SURP-II Federal Member States (FMS) inter-ministerial committee.

The Garowe PIU will have overall responsibility for the E&S safeguards due diligence, and compliance monitoring of the subproject activities. Based on the IOM reporting, it will prepare regular monthly/quarterly/semi-annual progress reports for the World Bank.

IOM and NRC: The activities for the Hoodale site will be implemented by IOM, NRC and contractors. The PCU has signed an output agreement with IOM to implement all Component 4 activities. The drainage excavation, with the assistance of local community workers, shall be implemented by IOM directly and the WASH components will be done via a local firm contracted by IOM. All other construction activities will be implemented by a local firm contracted by NRC. NRC & IOM will be responsible for: Management of the contractor on implementation of this ESMP, as advised by the PIU; management of directly recruited community workers including in regards to EHS responsibilities; liaise with various Government agencies on E&S matters; continuously interact with key stakeholders including IDPs, relevant NGOs and host community groups; establishment of dialogue with affected communities and ensuring that environmental and social concerns and suggestions are incorporated and implemented; ensuring the performance of the project in terms of E&S safeguards; provision of quarterly updates on E&S measures and incidents to the PIU; provision of informal monthly updates to the PIU; reporting on severe incidents within 24 hours to the PIU with copy to the World Bank.

The Contractors: IOM & NRC will recruit at least 6 contractors for activities like topographic surveying, site preparation, culvert installation, latrine construction, water supply pipeline installation. The contractors will be responsible for employment of a qualified environmental, social, occupational health and safety expert to manage ESHS issues; preparation and implementation of the labor management procedures; preparation of a contractor's ESMP (including OHS provisions) which will apply to the contracted workers. These procedures and plans will be submitted to IOM & NRC for review and approval before the contractors are allowed to mobilize to the field; supervising of subcontractors to ensure adherence to the LMP, ESMP and maintenance of records of recruitment and employment of contracted workers (including subcontractors) with age verification to avoid child labor; provision of induction and regular training to contracted workers on environmental, social and occupational health and safety issues, including training to workers exposed to specific risks associated with their work; requiring potential primary suppliers to identify and address risks of child labor, forced labor and serious safety issues for primary supply workers; developing and implementing grievance mechanism for contracted workers, including ensuring that grievances received from contracted workers are resolved promptly, and report the status of grievances and resolutions; ensuring that all contracted workers understand and sign the Code of Conduct prior to the commencement of works, and all other measures to address risks SEA/SH as specified in the contractor's LMP/ESMP are taken; reporting to IOM on labor and occupational health and safety performance.

Annex 1: Stakeholder Consultations (omitted before disclosure)

Annex 2: List of available GBV Service Providers

GBV Service Providers Nugaal, Puntland State of Somalia

No	GBV Service Provider	Type of Service	Contact address	Location
1.	MOWDAFA	Psychosocial Support include Skill Training	Amina Mohamoud Tell: 0907740230	Garowe
		Safe House	Amina Mohamoud Tell: 0907740230	Garowe
2.	Garowe G. Hospital	Medical Response	Drs Habiba Tell: 0907746569	Garowe
3.	Mato-Kaal Stop Center, Garowe Hospital	Medical Response	Fatima Abdirahman maatokaal@gmail.com 0906846888	Garowe
		Psychosocial support include material support	Fatima Abdirahman maatokaal@gmail.com 0906846888	Garowe
		Legal Aid	Fatima Abdirahman maatokaal@gmail.com 0906846888	Garowe
4.	Kaalo	Medical for fistula	Hamdi Faysal Tell: 0906083001 program@kaalo.org	Eyl and Garowe

		Psychosocial support	Hamdi Faysal Tell: 0906083001 program@kaalo.org	Garowe
		Dignity Kit	Hamdi Faysal Tell: 0906083001 program@kaalo.org	Garowe
5.	World Vision	Medical Service	Drs. Hodan Tell: 0907740792	Eyl
		Psychosocial Support	Buho Nor Tell: 0907709648	Eyl and Garowe
6.	International Rescue Committee (IRC)	Medical Support (Kalkaal Health Centre)	Bahjo Abdishakur (Response Officer)-090 7790265 Saynab Abdikhayr Mohamed (Case Worker)- 0907758312 Email: ahmed.zubayr@rescue.org	Burtinle (Horumar Village)
		Transportation and Referral Cost for Survivors	Bahjo Abdishakur (Response Officer)-090 7790265 Saynab Abdikhayr Mohamed (Case Worker)- 0907758312 Email: ahmed.zubayr@rescue.org	Burtinle and Garowe
		Psychosocial Support including Dignity Kits	Bahjo Abdishakur (Response Officer)-090 7790265 Saynab Abdikhayr Mohamed (Case Worker)- 0907758312	Burtinle

			Email: ahmed.zubayr@rescue.org	
		Skill Training for Survivors (Tailoring, Henna, Tie and Dye, Literacy & Numeracy)	Bahjo Abdishakur (Response Officer)-090 7790265 Saynab Abdikhayr Mohamed (Case Worker)- 0907758312 Email: ahmed.zubayr@rescue.org	Burtinle
7.	TASS	Psychosocial support including dignity kits	Fadumo Abdikani Shire Tell: 0907776757 Email: tassgr@outlook.com	Garowe
		Safe House	Fadumo Abdikani Shire Tell: 0907776757 Email: tassgr@outlook.com	Garowe
8.	SRCS	Psychosocial support	Farxiyo Siad Nur Tell: 0907724081	Dangoroyo and Garowe
9.	PSA	Medical Support	Nasteha Nidam, Tell: 0907609378 psagarowe@gmail.com	Garowe
		Psychosocial support and Livelihood	Nasteha Nidam, Tell: 0907609378 psagarowe@gmail.com	Garowe
10.	SHILCON	Safe House	Ikraam Muse: 0907750620	Burtinle
11.	Puntland Human Right Defender office	Legal Aid	Farah Mumin Yusuf Email: farah.mumin1010@gmail.com	Garowe

			Tell: 0907724141	
12.	PSU Legal Aid	Legal Aid	Mohamed Jelle/ Daahir Shikh Xaamud Email: psulac01@gmail.com Tell: 0907793809/0907794834	Garowe
13.	Puntland Women Lawyers Association	Legal Aid	Fatima Abdullahi Mumin/ Fartoun Ali Email: puwla.org@gmail.com Tell: 0907623135/0907740061	Garowe
14.	Puntland Legal Aid Center	Legal Aid	Faiza Abdulhi Ilmi Email: psulac01@gmail.com Tell: 0907742626	Garowe
15.	Women Police Desk	Safety and Security	Abdifitah Abdikadir Ahmed/ Shamso Abdi Bille Tell: 0907368699/090770376	Garowe
16.	Community Policing	Safety and Security	Hamdi Ahmed Mohamed/ Naima Abdi Bootaan Tell: 0907628871 / 0907651844	Garowe

N.B: All the organizations also provides prevention activities include, community awareness, capacity building, forums, radio programs and discussions on GBV Prevention and service availability.

Annex 3: Screening Results of IOM GRM

Name of Implementing Partner: IOM				
Date: October 2022				
Name of Respondent:				
No.	Criteria	Yes	No	Comment/ Explanation and Gap-filling measures
General GRM				
1.	Does the IP have clear, formal, and transparent internal mechanisms and rules for addressing grievances?	X		Yes, IOM has a clear mechanism in place
2.	Does IP staff responsible for grievance redress have the authority to take or demand remedial action?	X		Yes, as part of the mechanism staff can take actions
3.	Are IP staff responsible for grievance redress obliged to take action on all grievances?	X		Yes, if they are related to the project
4.	Are beneficiaries allowed to lodge grievances anonymously without fear of retaliation?	X		Yes, that is possible
5.	Are beneficiaries aware of their right to file a grievance and of the grievance redress process in general?	X		Yes, awareness raising of the mechanism is undertaken
6.	Do clear mechanisms of communication exist for potential users of the GRM on the existence and processes of the GRM?	X		Yes, awareness raising and written pamphlets are available
7.	Does communication material exist for the general public (what kind of material is it? How is it disseminated)?	X		Yes, communication material does exist
8.	Are there internal processes in place to record, track, and monitor the grievances and the action taken?	X		Yes, grievance registers exist
9.	Does the GRM provide timely feedback (written or otherwise) to the aggrieved party on actions taken?	X		Yes, timely feedback is provided
10.	Is a system in place to keep complainants informed with status updates?	X		Yes, complainants are kept informed

11.	Is there an appeals process in place that GRM users can access if they are not satisfied with how their grievance has been resolved?	X		An appeals process exist
12.	Do multiple grievance uptake channels and locations exist?	X		Yes, multiple channels exist, for example help desks at the construction sites
13.	Are grievance uptake channels accessible for all stakeholders including vulnerable groups (such as women, persons with disabilities, illiterate persons)?	X		Yes, vulnerable groups are included in the GRM
14.	Is there a fixed service standard for grievance resolution?	X		Yes, there is a procedures in place
15.	Do clear grievance processing guidelines exist?	X		Yes, clear guidance exists
16.	Does the GRM contain the typical GRM value chain (Uptake, sort and process, acknowledge and follow-up; verify, investigate and act; monitor and evaluate; provide feedback)	X		Yes, it follows the GRM value chain
17.	Does a process for periodic evaluation of the GRM logs/data exist that informs proactive actions to stem complaints and grievances?	X		Yes, periodic reviews are undertaken

Annex 4: E&S Screening of Subproject Site

INDICATIVE ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST


No	ITEM	DETAILS		
INTRODUCTION				
1	Project Name	SURP-II and SURP-II Additional Financing		
2	Project Location	Garowe, Puntland, Somalia.		
3	Project Description (brief)	The World Bank is providing funding to the Federal Government of Somalia (FGS) and to the Federal Member States (FMS) of Puntland, Southwest State, and the Banadir Regional Administration (BRA) through the Somalia Urban Resilience Project Phase II (SURP-II) to strengthen public service delivery capacity of local governments and increase access to urban infrastructure and services in selected areas. One of the activities under the Contingency Emergency Component of the SURP-II in the Puntland state includes the development of a site for relocation of 1,000 HHS, which calls for the engagement of a local firm to carry out Digital Topographic survey of the site with a size of 45 hectares.		
4	Does the Project require any:	<i>yes</i>	<i>no</i>	<i>If yes, extent in ha.</i>
	Reclamation of land, wetlands		X	
	Clearing of grazing lands		X	
	Felling of trees		X	
5	Minimum land area required for the proposed development (ha)	45 hectares		
6	Available total land area within the identified location (ha)	40 hectares (5 hectares are still being sought out by Municipality of Garowe)		
7	Expected construction period	March 2023 – December 2023		
8	Responsible contact person, contact Information	1. Nadeem ilyas – NRC Shelter Specialist – 2. Abdullahi Omar Keinan – NRC Puntland Area Manager - abdullahi.keinan@nrc.no		
9	Present land ownership	<i>State: X</i>	<i>Private:</i>	<i>Other:</i>

No	ITEM	DETAILS	
10	Source of funding of the borrower	World Bank	
11	Total Cost of the Project	USD 4,878,751	
12	Anticipated Date of Completion	31 st March, 2024	
ENVIRONMENTAL IMPACT AND MITIGATION/ENHANCEMENT DURING CONSTRUCTION PERIOD			
	Impacts	Description	Mitigation/Enhancement
13	Soil erosion	No soil erosion will occur at the site.	-
14	Water pollution	There is no river or lake on the project site, thus there will be no water pollution.	-
15	Noise pollution	The place is 5.1 KM away from the city and currently unoccupied. Thus, there will be no noise pollution.	-
16	Excessive solid waste generation and inappropriate disposal	There may be some solid waste as a residual item from the construction.	The beneficiaries selection and water management committee will be held responsible for disposal of solid waste from the construction site. Secondly, each HH will be guided to dispose off its garbage/solid waste and take it to city disposal site.
17	Loss of vegetation cover	There is no vegetation at site. It is completely barren.	-
18	Habitat loss or fragmentation	No will be no habitat loss or fragmentation.	-
19	General disturbance to animal behaviour	There are no animals on project site.	-
20	Interference with normal movement of animals	There will be no interference with normal movement of animals.	-
21	Irreversible/irreparable environmental change	The project will not bring any irreversible/irreparable environmental change.	-

No	ITEM	DETAILS	
21	Possible exposure to COVID-19 transmission	Currently, the prevalence of COVID-19 has reduced.	In case the COVID-19 erupts again, all the workers will be directed to adopt relevant precautionary measures against COVID-19.
22	Enhanced risk of flooding in riparian cities	The site is not located in riparian city.	-
23	Adverse impacts on river and coastal ecosystem resulting from: (i) alterations of surface runoff through compaction of soils and increase in impermeable surfaces, (ii) changes to flow regimes of ephemeral streams and intermittent rivers (water velocity, depth, depositional patterns, and channel morphology) and, (iii) locating of outfall points at or near the shorelines of Mogadishu and Kismayo	This is also not applicable.	-
24	Accidental leaks/spills of oil/fuel from on-site construction facilities, equipment, or machinery, and accidental damage to septic tanks located on the right of way	The Shelters will be constructed through owner driven approach. Thus, there will be no big machinery on site which could jeopardize the site.	-

COMMUNITY ENGAGEMENT

21	Number and nature of public consultation meetings conducted so far	Type of Meeting	Number of Meetings	Nature of Participants	Participants	
					Male	Female
		ESMP Consultation	1	Target Youth & Elder group and Garowe local municipality	15	4
		ESMP Consultation	1	Target local authority, women group, NGO and Garowe local municipality	10	6
		Introductory meeting with PIU	1	NRC, PIU and Mayor of Garowe with local authority staff	6	0

No	ITEM	DETAILS				
		Consultative meeting	1	NRC, IOM, PIU and Mayor of Garowe	4	0
		Consultative meeting	1	NRC, IOM, PIU and Director General (DG) of Ministry of Interior, Federalism and Democratization (MOIFAD)	7	0
CONTACT DETAILS OF OFFICIALS						
	Name of the person completing form	Nadeem ilyas				
	Designation and contact information	Shelter Specialist Nadeem.ilyas@nrc.no +252 617 022151				
	List of team members	<ol style="list-style-type: none"> 1. Abdullahi Omar Keinan 2. Shezane Kirubi 3. Abdihakim Mohamed Farah 4. Ali Saliban Jama 				
	Signature and date	 15/01/2023				

Annex 5: Land Documents



104873380-6890

**DOWLADDA
PUNTLAND
EE SOMALIA**



**PUNTLAND
STATE OF
SOMALIA**

Shahaadada Lahaanshaha Hantida Ma Guurtada Ah / Property Ownership Certificate

Taariikhda Diiwaangalinta:

06-10-2022

Ciwaanka Waddada:

Jilab, 70101

Cabbirka Dhulka:

Garowe, Puntland, Somalia

315272 Sq.Meters

Magaca Mulkiilaha

Dh DANTA GUUD EE D/HOOSE

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

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

DUQA DOWLADDA HOOSE EE DEGMADA GAROOWE

Maxamuud Cali Xasan
XOGHAYAHA DEGMADA



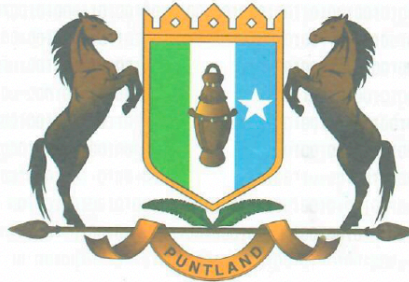
Abdulkadir Mohamed Mohamud
DUQA DEGMADA





127923277-7623

**DOWLADDA
PUNTLAND
EE SOMALIA**



**PUNTLAND
STATE OF
SOMALIA**

Shahaadada Lahaanshaha Hantida Ma Guurtada Ah / Property Ownership Certificate

Taariikhda Diiwaangalinta:	13-02-2023
Ciwaanka Waddada:	Jilab, Garoowe, 70101, Jilab, 70101 Garoowe, Puntland, Somalia
Cabbirka Dhulka:	38093 Sq. Meters

Magaca Mulkiilaha
Dh DANTA GUUD EE D/HOOSE

Tani waa warqada lahaanshaha Hantida Ma Guurtada ah oo asal ah. Lama ogola in la daabaco
This is the original Property ownership certificate on file. It is illegal to make copies of this certificate

DUQA DOWLADDA HOOSE EE DEGMADA GAROOWE

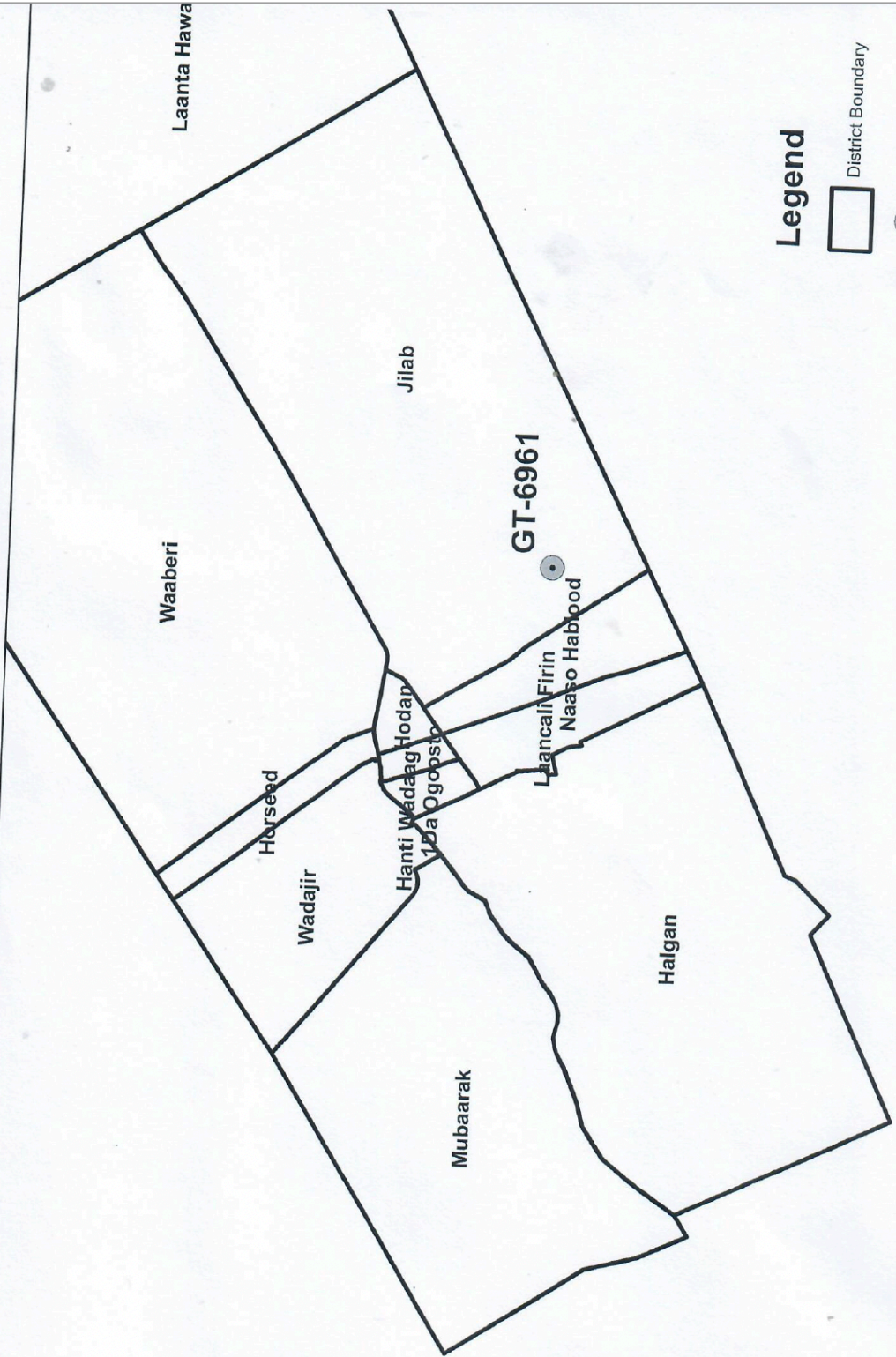
Maxamuud Cali Xasan
XOGHAYAHA DEGMADA



Abdulkadir Mohamed Mohamud
DUQA DEGMADA



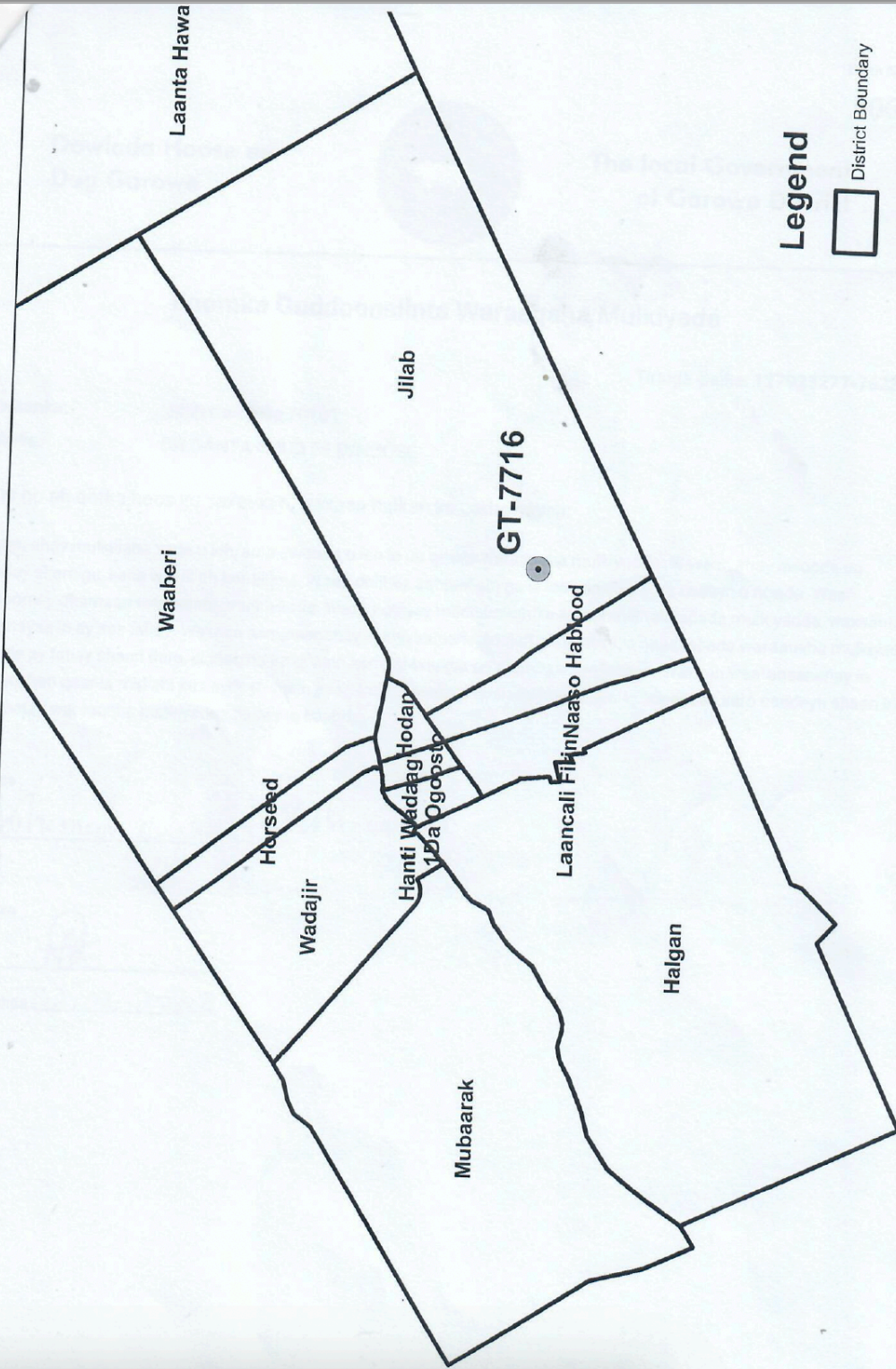
Property Overview Map





Legend

- District Boundary
- Parcel_Status

Property Overview Map



Legend

-  District Boundary
-  Parcel_Status